

Child Welfare Policy Manual

6. CCWIS

6.1 CCWIS Definitions

1 Q: 1355.52(b)(1)(iv) requires the title IV-E agency's CCWIS to maintain "Case management data to support federal audits, reviews, and other monitoring activities." What does "case management" mean?

A: ACF has not specifically defined the term "case management" because states and tribes define case management differently due to varying laws, policies, and practices.

ACF does, however, provide examples of case management activities. The CCWIS Notice of Proposed Rulemaking identifies activities considered "case management" to include the collection and updating of information such as child and family histories, assessments, contact notes, calendars, services recommended and delivered, eligibility for programs and services, and client outcomes.

Source: (9/14/16)

Reference: Section 474 of title IV-E of the Social Security Act; Section 106 CAPTA; 45 CFR 1355.52(b)(1)(iv); 80 FR 48200 at 48213 (August 11, 2015); 58 FR 67939 at 67946 (December 22, 1993); ACYF-CB-PI-13-06.

2 Q: Is a foster family agency that provides for the daily care and supervision of foster children considered a child welfare contributing agency (CWCA)?

A: It depends. If a foster family agency has a contract or agreement with the title IV-E agency and provides child abuse and neglect investigations, placements, or child welfare case management services, this is a CWCA.

Source: (9/14/16)

Reference: 45 CFR 1355.51(a); 81 FR 35450 at 35453 (June 2, 2016)

Child Welfare Policy Manual

- 3 **Q:** Are county public entities, in county-administered states (such as County Children and Youth agencies), that provide child abuse and neglect investigations, placements, or child welfare case management services defined as child welfare contributing agencies (CWCAs)?

A: No. Counties are political subdivisions of the state, and the single state title IV-E agency designated in the state's title IV-B and title IV-E plan supervises the administration of county-administered title IV-B and IV-E programs. Therefore, counties in county-administered states are not considered CWCAs. Section 471(a)(2) of the Act and 45 CFR 205.100 provide the authority and parameters by which a single state title IV-E agency may delegate the administration of the title IV-E program to the state's political subdivisions and local agencies or offices.

Source: (9/14/16)

Reference: Section 471(a)(2) of the Act; 45 CFR 205.100 and 1355.51(a); 81 FR 35450 at 35453 (June 2, 2016)

- 4 **Q:** Both a S/TACWIS and non-S/TACWIS project is defined in section 1355.51 as being "an 'active' automated data processing system or project." What does "active" mean in this context?

A: "Active" means a system that the state or tribe is using as of the effective date of these regulations (August 1, 2016), or the state or tribe is designing, developing or implementing the system as of the effective date of the regulations.

Source: (9/14/16)

Reference: 45 CFR 1355.51; 80 FR 48200 at 48205 (August 11, 2015)

- 5 **Q:** Is a public or private entity that provides child abuse and neglect investigations, placement, or child welfare case management (or any combination of these) to children and families through contract or agreement with a county child welfare agency, considered a "child welfare contributing agency" (CWCA) as defined in section 1355.51?

A:

Child Welfare Policy Manual

Yes. CWCAs include public or private entities providing child abuse and neglect investigations, placement, or child welfare case management (or any combination of these) that have contracts or agreements with county child welfare agencies that are administering the IV-E program.

Source: 4/24/2017

Reference: 45 CFR 1355.51; 81 FR 35450 at 35453 (issued June 2, 2016); 80 FR 48200 at 48205 (issued August 11, 2015)

6.2 Efficient, economical, and effective

No questions and answers are available at this time.

6.3 CCWIS data

1 Q: What does it mean in paragraph 1355.52(b) that CCWIS must "maintain" data?

A: The CCWIS must "maintain" data by storing and sharing data with other appropriate child welfare automated data processing systems. The CCWIS must also "maintain" data by consistently applying data quality processes and procedures to the data no matter where the data may have been initially collected.

Source: 10/27/2016

Reference: 45 CFR 1355.52(b); 81 FR 35450 at 35454 (issued June 2, 2016); 80 FR 48200 at 48207 (issued August 11, 2016)

2 Q: Does the requirement of paragraph 1355.52(b) to maintain all CCWIS data in the CCWIS allow child welfare contributing agency (CWCA) systems to collect CCWIS data?

A: Yes. CWCA systems may collect CCWIS data if the data is electronically exchanged with CCWIS, per paragraph 1355.52(e)(1)(ii).

Source: 10/27/2016

Child Welfare Policy Manual

Reference: 45 CFR 1355.52(b); 45 CFR 1355.52(e)(1)(ii); 81 FR 35450 at 35454 and 35463 (issued June 2, 2016); 80 FR 48200 at 48203, 48207 and 48212 (issued August 11, 2016)

3 Q: Is the use of a centralized data warehouse (in addition to a CCWIS production database) permitted as part of the overall CCWIS design?

A: Yes. The title IV-E agency may maintain CCWIS data in a CCWIS production database (which is a database processing CCWIS transactions) and a data warehouse (which is a database used for reporting and data analysis) provided all CCWIS automated functions seamlessly access data from both the database and data warehouse. For example, when generating a report or completing a task that requires data from both the database and data warehouse, CCWIS must be able to immediately access needed data.

Source: 10/27/2016

Reference: 45 CFR 1355.52(b); 81 FR 35450 at 35454 (issued June 2, 2016)

6.3A Federal data

1 Q: What federal data are required to be maintained in CCWIS per paragraph 1355.52(b)?

A: The federal data required to be maintained in CCWIS are described in federal child welfare laws and policies. Because the required federal data may change as laws and policies change, paragraph 1355.52(b) lists categories of data from these laws and policies rather than specify a comprehensive set of federal data. ACF will use the federal laws, regulations, and policies effective at the time of a CCWIS review to determine compliance with paragraph 1355.52(b). Below are examples of required federal data, based on laws and policies in effect at the time the CCWIS final rule was published.

Examples of federal data required to be maintained in CCWIS for ongoing federal child welfare reports include:

<ul style="list-style-type:Disc; margin-left: 2em;">

Child Welfare Policy Manual

All AFCARS data;

For state title IV-E agencies, NYTD case management data must be maintained in CCWIS, although NYTD outcomes information collected from periodic surveys may be maintained in external systems;

Financial information for the CB-496, such as training costs, demonstration project costs, and administrative costs may be maintained in a separate financial system that exchanges data with CCWIS per paragraph 1355.52 (e)(1)(i). Other data, such as the average monthly number of children receiving title IV-E Foster Care maintenance assistance payments, may be derived from CCWIS case management and placement records.

Examples of federal data required for title IV-E eligibility determinations, authorizations of services, and expenditures under titles IV-B and IV-E include:

<ul style="list-style-type:Disc; margin-left: 2em;">

Data necessary for title IV-E eligibility determinations includes data such as the factors used to demonstrate the child would qualify for AFDC under the 1996 plan, placement licensing and background check information, and court findings.

Data required for authorizations of services and other expenditures under titles IV-B and IV-E includes data such as documentation of services authorized, records that the services were delivered, payments processed, and payment status, including whether the payment will be allocated to one or more federal, state, or tribal programs for reimbursement, and the payment amount allocated.

Financial information may be maintained in a financial system exchanging data with CCWIS.

Child Welfare Policy Manual

Examples of federal data documenting interactions with and on behalf of clients that the title IV-E agency determines is needed to support federal child welfare laws, regulations, and policies include:

<ul style="list-style-type:Disc; margin-left: 2em;">

case management information,

recommended services,

placement data, and

licensing information on foster care providers.

Examples of federal case management data collected in the course of casework with clients that may be needed for a Child and Family Services Review (CFSR) includes:

<ul style="list-style-type:Disc; margin-left: 2em;">

abuse and neglect reports,

case plans, and

placement histories.

Source: 10/27/2016

Child Welfare Policy Manual

Reference: Section 474(a)(3)(C)(i) of the Social Security Act; 45 CFR 1355.52(b); 81 FR 35450 at 35454 - 35455 (issued June 2, 2016); 80 FR 48200 at 48206 - 48207 (issued August 11, 2016); ACYF-CB-PI-10-04 (issued April 2, 2010)

6.3B State data

- 1 Q:** Is substance abuse treatment and parenting class information considered data that the title IV-E agency's CCWIS is required to maintain "to support state or tribal child welfare laws, regulations, policies, practices, reporting requirements, audits, program evaluations, and reviews" in accordance with paragraph 1355.52(b)(2)?
- A:** It depends. Title IV-E agencies must maintain substance abuse treatment and parenting class data in its CCWIS if the IV-E agency has determined that such data supports a data need based on the agency's specific circumstances, populations, title IV-B and IV-E plans, and business practices.

We do not require title IV-E agencies to maintain this specific data to allow agencies flexibility to implement a CCWIS tailored to their needs.

Source: 10/27/2016

Reference: 45 CFR 1355.52(b); 81 FR 35450 at 35455 (issued June 2, 2016); 80 FR 48200 at 48207 (issued August 11, 2016)

Child Welfare Policy Manual

2 Q: How will ACF determine title IV-E agency compliance with the requirement that CCWIS maintain data "to support state or tribal child welfare laws, regulations, policies, practices, reporting requirements, audits, program evaluations, and reviews" per paragraph 1355.52(b)(2)?

A: ACF will determine compliance with this requirement by reviewing state and tribal laws, regulations, policies, practices, reporting requirements and audit, program evaluation, and CCWIS review requirements in consultation with title IV-E agency representatives. For example, to determine if CCWIS maintains the data necessary to support state or tribal practices, we will consider the information needs of child welfare contributing agencies (CWCAs). If we document a pattern of CWCAs re-entering information clients provided to other CWCAs, that may suggest that the data should be in CCWIS and shared with CWCAs to prevent the duplicate entry of needed data. In such circumstances, we will consult with the title IV-E agency before determining if the data should be classified as CCWIS data and exchanged with the title IV-E agency's CCWIS.

Source: 10/27/2016

Reference: 45 CFR 1355.52(b)(2); 81 FR 35450 at 35455 (issued June 2, 2016); 80 FR 48200 at 48207 (issued August 11, 2016)

6.3C ICWA

1 Q: Are state title IV-E agencies required to build electronic data exchanges with federally recognized Indian tribes, tribal organizations, and tribal consortia to comply with the Indian Child Welfare Act (ICWA) requirements of paragraph 1355.52(b)(3)?

A: No. The regulations do not require a data exchange between CCWIS and federally recognized Indian tribes, tribal organizations, and tribal consortia. However, section 1355.54 permits this optional data exchange. Optional data exchanges proposed by a title IV-E agency and approved by ACF may qualify for CCWIS cost allocation as described at section 1355.57.

Source: 10/27/2016

Reference: 45 CFR 1355.52(b)(3); 45 CFR 1355.54; 45 CFR 1355.57; 81 FR 35450 at 35455, 35471 and 35473 - 35475 (issued June 2, 2016); 80 FR 48200 at 48207 - 48208, 48218 - 48219, and 48220 - 58222 (issued August 11, 2016)

Child Welfare Policy Manual

6.3D NCANDS

No questions and answers are available at this time.

6.4 Reporting

1 Q: May a title IV-E agency use a centralized data warehouse and a CCWIS production database to generate a report or complete a task using data?

A: Yes. However when generating a report that requires data from both the database and data warehouse, CCWIS must be able to immediately access needed data.

Source: 10/27/2016

Reference: 45 CFR 1355.52(c); 81 FR 35450 at 35456 (issued June 2, 2016) 80 FR 48200 at 48208 (issued August 11, 2016)

2 Q: Can an agency use non-CCWIS data sources to produce reports under paragraph 1355.52(c)?

A: CCWIS must provide CCWIS data as needed for reports per paragraph 1355.52(c)(1), however, CCWIS is not required to produce every agency report. If CCWIS maintains a subset of a required report's data, CCWIS is not required to generate the complete report, but must provide the data maintained in the CCWIS for incorporation into the report.

Agencies may decide how to provide the data. For example:

<ul style="list-style-type:Disc; margin-left: 2em;">

CCWIS may transmit available National Youth in Transition Database (NYTD) data to a system that collects NYTD survey data and generates the federal report.

CCWIS may support financial audits by providing data on authorized placements and services that may be merged with non-CCWIS data to create audit trails.

Child Welfare Policy Manual

CCWIS may provide a hardcopy summary of demographic and placement statistics that staff add to a narrative report demonstrating progress on Child and Family Service Review (CFSR) goals.

Data analysts may use a spreadsheet of CCWIS data to develop reports on trends in child welfare.

If, however, CCWIS maintains all the data required for a report, the report must be generated entirely from that data. For example, even if child welfare contributing agencies (CWCAs) collect Adoption and Foster Care Analysis and Reporting System (AFCARS) data, the AFCARS report must be generated from the data provided by CWCAs and maintained in CCWIS.

Source: 10/27/2016

Reference: 45 CFR 1355.52(c); 81 FR 35450 at 35456 (issued June 2, 2016); 80 FR 48200 at (issued August 11, 2016)

Child Welfare Policy Manual

6.4A Federal reports

No questions and answers are available at this time.

6.4B State and tribal reports

No questions and answers are available at this time.

6.5 Data quality

1 Q: What are the data security, archiving, and purging requirements for CCWIS?

A: These requirements are addressed in paragraphs 1355.30(i) and (k) and 1355.52(j) as follows:

Paragraph 1355.30(i) applies the requirements at 45 CFR 75.361 to programs funded under titles IV-B and IV-E of the Social Security Act.

Paragraph 1355.30(k) applies 45 CFR 95.621(f) to CCWIS projects meeting the thresholds at 45 CFR 95.611.

Paragraph 1355.52(j) applies 45 CFR 95.621(f) to CCWIS projects below the thresholds at 45 CFR 95.611.

Source: 10/27/2016

Reference: 45 CFR 92.42; 45 CFR 95.611; 45 CFR 95.621(f); 45 CFR 1355.30(i); 45 CFR 1355.30(k); 81 FR 35450 at 35457 (issued June 2, 2016)

Child Welfare Policy Manual

6.5A Standards and confidentiality

1 Q: Are missing or unknown data elements permitted by the CCWIS data quality requirements and standards of paragraph 1355.52(d)(1)(i)?

A: It depends. CCWIS data quality requirements and standards are defined in federal, state and tribal program regulations, laws, and policies related to specific data elements and their use. Paragraph 1355.52(d)(1)(i) mandates data quality standards for completeness, timeliness, and accuracy of CCWIS data, but does not specify the data quality standard applicable to specific data elements.

Some data quality standards, such as the ones applicable to AFCARS data, define specific values for AFCARS data elements that may require only known values for certain data or set limits for missing data. But a different data quality program or reporting standard may specify conditions where data is not required or permit "unknown" as a data value.

In cases where two or more data quality standards apply to the same data element, the most rigorous standard applies, per paragraph 1355.52(d)(1)(i).

Source: 10/27/2016

Reference: 45 CFR 1355.52(d)(1)(i); 81 FR 35450 at 35457 (issued June 2, 2016); 80 FR 48200 at 48208 - 48209 (issued August 11, 2016)

Child Welfare Policy Manual

2 Q: May a title IV-E agency automatically prefill CCWIS data fields with known information?

A: It depends. The automatic calculation of data based on information previously known to the system, such as the name of a worker's supervisor or a zip code for an entered address, is allowable. Use of system-calculated data, such as system generated time stamps to capture the time of record entry or to accurately calculate current age from birth date data known to the system, is allowable.

However, the automated generation of default data, such as classifying all citizenship values as U.S. citizenship, is prohibited because users may not uniformly verify or correct inaccuracies in the default value pursuant to 1355.52(d)(1)(v).

Source: 10/27/2016

Reference: 45 CFR 1355.52(d)(1)(v); 81 FR 35450 at 35457 (issued June 2, 2016); 80 FR 48200 at 48209 (issued August 11, 2016)

6.5B Automated support for data quality

1 Q: Under paragraph 1355.52(d)(2)(iii), what data may CCWIS request through the required exchange with child welfare contributing agency systems?

A: Per paragraph 1355.52(d)(2)(iii), the electronic requests are for current and historical CCWIS data. The electronic requests may include data meeting any of the requirements of paragraph 1355.52(b), which describes the CCWIS data requirements.

Source: 10/27/2016

Reference: 45 CFR 1355.52(b); 45 CFR 1355.52(d)(2)(iii); 81 FR 35450 at 35454 - 35456 and 35458 (issued June 2, 2016); 80 FR 48200 at 48206 - 48208 and 48210 (issued August 11, 2016)

Child Welfare Policy Manual

2 Q: How is duplicate data entry defined?

A: Duplicate data entry is the manual reentry of data already captured by either the CCWIS or another system required to provide data to CCWIS.

Source: 10/27/2016

Reference: 45 CFR 1355.52(d)(2)(iv); 81 FR 35450 at 35458 (issued June 2, 2016)

6.5C Data quality reviews

1 Q: Are there other CCWIS data quality reviews in addition to the biennial data quality reviews?

A: No. Paragraph 1355.52(d)(3) describes the biennial data quality review, which is the only required CCWIS data quality review.

Source: 10/27/2016

Reference: 45 CFR 1355.52(d)(3); 81 FR 35450 at 35458 (issued June 2, 2016)

2 Q: Are the data quality reviews described at paragraph 1355.52(d)(3) conducted by ACF central or regional office staff, the title IV-E agency, or another party?

A: The title IV-E agency conducts the data quality review. However, paragraph 1355.52(d)(3) does not prohibit the agency from seeking assistance, such as from another agency or a vendor of data quality services, with the data quality review.

Source: 10/27/2016

Reference: 45 CFR 1355.52(d)(3); 81 FR 35450 at 35458 (issued June 2, 2016); 80 FR 48200 at 48210 (issued August 11, 2016)

Child Welfare Policy Manual

3 Q: What activities and processes must be part of the biennial data quality review described in paragraph 1355.52(d)(3)?

A: The activities and processes for the data quality review established by the title IV-E agency and approved by ACF must meet the requirements of paragraph 1355.52(d)(3). Title IV-E agencies have flexibility to select a review process most suitable for their circumstances. Examples of activities in biennial review processes include: reviewing a sample of case records, interviewing select state/tribal and child welfare contributing agency staff, evaluating automated edit checks, and a reviewing of data quality reports. Some data quality activities, such as automated processes, may be continuous while other activities may occur one time during the biennial review period.

Source: 10/27/2016

Reference: 45 CFR 1355.52(d)(3); 81 FR 35450 at 45458 (issued June 2, 2016); 80 FR 48200 at 48210 (issued August 11, 2016)

4 Q: Is CCWIS cost allocation available for staff time spent planning and conducting the data quality review?

A: It depends. Planning and conducting the data quality review is an approved activity as defined at section 1355.51 and qualifies for CCWIS cost allocation as described in section 1355.57(c). Data correction and related program activities do not qualify for CCWIS funding.

Source: 10/27/2016

Reference: 45 CFR 1355.51; 45 CFR 1355.52(d); 45 CFR 1355.57(c); 81 FR 35450 at 35459 (issued June 2, 2016); 80 FR 48200 at 48204, 48210, and 48221 (issued August 11, 2016)

Child Welfare Policy Manual

5 Q: Are title IV-E agencies required to include child welfare contributing agencies (CWCAs) that have contracts or agreements with county child welfare agencies in the biennial data quality reviews required by paragraph 1355.52(d)(3)?

A: Yes. The title IV-E agency must include all CWCAs in the biennial data quality reviews, pursuant to paragraph 1355.52(d)(3)(i).

Source: 4/24/2017

Reference: 45 CFR 1355.52(d)(3); 81 FR 35450 at 35458 - 35460 (issued June 2, 2016); 80 FR 48200 at 48210 (issued August 11, 2015)

6.5D Data quality findings

1 Q: What actions must the title IV-E agency take to address findings from the data quality reviews described in paragraph 1355.52(d)(3)?

A: Title IV-E agencies must correct the factors contributing to poor quality data, such as data collection procedures and training, CCWIS programing errors, or problems with bi-directional data exchanges, per paragraph 1355.52(d)(4). Agencies must propose how they will address review findings and demonstrate improvement in data quality in their data quality plans, per paragraph 1355.52(d)(5).

Source: 10/27/2016

Reference: 45 CFR 1355.52(d)(3) - (5); 81 FR 35450 at 35458 - 35461 (issued June 2, 2016); 80 FR 48200 at 48210 - 48211 (issued August 11, 2016)

Child Welfare Policy Manual

- 2 **Q:** Does the requirement to address CCWIS data quality review findings in paragraph 1355.52(d)(4) require title IV-E agencies to correct previously collected data?

A: No. The regulation permits, but does not require, agencies to correct previously collected data.

Source: 10/27/2016

Reference: 45 CFR 1355.52(d)(4); 81 FR 35450 at 35460 (issued June 2, 2016); 80 FR 48200 at (issued August 11, 2016)

- 3 **Q:** Are there deadlines for the title IV-E agency to correct findings from a data quality review?

A: No. The title IV-E agency will propose timeframes to correct findings for ACF approval as part of the data quality plan per paragraph 1355.52(d)(5) or an Advance Planning Document (APD) per 45 CFR 95, Subpart F.

Source: 10/27/2016

Reference: 45CFR 95, Subpart F; 45 CFR 1355.52(d)(3) - (5); 81 FR 35450 at 35458 - 35461 (issued June 2, 2016); 80 FR 48200 at 48210 - 48211 (issued August 11, 2016)

6.5E Data quality plans

- 1 **Q:** Are title IV-E agencies that do not implement a CCWIS required to develop a CCWIS data quality plan?

A: No.

Source: 10/27/2016

Reference: 45 CFR 1355.52(d)(5); 81 FR 35450 at 35461 (issued June 2, 2016)

Child Welfare Policy Manual

2 Q: When must the title IV-E agency submit the first CCWIS data quality plan?

A: Title IV-E agencies must include the CCWIS data quality plan as part of the first Annual or Operational Advance Planning Documents (APDs) submitted to ACF after the agency formally notifies ACF that it will implement a CCWIS.

Source: 10/25/2017

Reference: 45 CFR 95.610; 45 CFR 1355.52(d)(5); 45 CFR 1355.52(i)(1); 81 FR 35450 at 35460 - 35461 and 35467 - 35468 (issued June 2, 2016); 80 FR 48200 at 48211 and 48216 - 48217 (issued August 11, 2015)

3 Q: Is a title IV-E agency required to include child welfare contributing agencies (CWCAs) in its data quality plan?

A: Yes. The data quality plan must describe how the title IV-E agency ensures the quality of data collected by CWCAs pursuant to 1355.52(d)(5)(i) and 1355.52(d)(3)(i).

Source: 02/12/2018

Reference: 45 CFR 1355.52(d)(3)(i); 45 CFR 1355.52(d)(5)(i); 81 FR 35450 at 35458 - 35461 (issued June 2, 2016); 80 FR 48200 at 48210 - 48211 (issued August 11, 2015)

6.6 Data exchanges

1 Q: Are title IV-E agencies only able to claim federal financial participation (FFP) for the bi-directional data exchanges described in paragraph 1355.52(e)?

A: No. In addition to the eleven mandatory bi-directional data exchanges required under 1355.52(e), a title IV-E agency may request approval to claim FFP for additional optional data exchanges, including uni-directional data exchanges, per section 1355.54.

Source: 11/07/16

Reference: 45 CFR 1355.52(e); 45 CFR 1355.54; 81 FR 35450 at 35461 and 35471 (issued June 2, 2016); 80 FR

Child Welfare Policy Manual

48200 at 48211 and 48218 - 48219 (issued August 11, 2016)

2 Q: Are title IV-E agencies required to track the source of data provided by bi-directional data exchanges per paragraph 1355.52(e)?

A: No. The CCWIS regulations do not require title IV-E agencies to track the source of data provided by data exchanges.

Source: 11/07/16

Reference: 45 CFR 1355.52(e); 81 FR 35450 at 35461 (issued June 2, 2016)

3 Q: Can a title IV-E agency's CCWIS that obtains data from a data warehouse instead of exchanging data through a bi-directional data exchange, satisfy a data exchange requirement of paragraph 1355.52(e)?

A: Yes, data obtained from a data warehouse may satisfy the data exchange requirement per paragraph 1355.52(e) if the data available in the data warehouse is complete, timely, accurate, and consistent.

Source: 11/07/16

Reference: 45 CFR 1355.52(e); 81 FR 35450 at 35462 (issued June 2, 2016); 80 FR 48200 at 48214 (issued August 11, 2016)

4 Q: Is title IV-E funding available to support the costs other programs incur in developing and operating the data exchanges described under 45 CFR 1355.52(e)(2)?

A: No. Title IV-E funding is not available for the data exchange costs of programs that are not title IV-E related, such as those described in 45 CFR 1355.52(e)(2)(ii) through (vi).

Child Welfare Policy Manual

Source: 11/07/16

Reference: Section 474(a)(3)(C) and (D) of the Social Security Act; 45 CFR 1355.52(e)(2); 45 CFR 1355.57(e); 81 FR 35450 at 35464 - 35466 and 35475 (June 2, 2016); 80 FR 48200 at 48212 - 48215 and 48222 (issued August 11, 2016); Action Transmittal ACF-OSS-05 (issued August 21, 1998)

- 5 **Q:** Paragraph 1355.52(e)(2) requires bi-direction data exchanges "to the extent practicable." What are the reasons that a title IV-E agency may cite to demonstrate that a bi-directional data exchange is not practicable?
- A:** Title IV-E agencies may present a business case in an Advance Planning Document (APD) describing the circumstances rendering a data exchange impracticable. These circumstances include, but are not limited to: (1) the other system is not capable of conducting an exchange; or (2) the exchange is not feasible due to cost constraints. Title IV-E agencies may cite any circumstances they deem relevant for ACF's consideration.

Source: 11/07/16

Reference: 45 CFR 1355.52(e)(2); 81 FR 35450 at 35464 (issued June 2, 2016); 80 FR 48200 at 48212 - 48213 (issued August 11, 2016)

- 6 **Q:** If a title IV-E agency is only able to establish a partial data exchange, is the agency in compliance with the requirements of paragraph 1355.52(e)(2)? For example, if some child welfare courts are able to establish a bi-directional data exchange with CCWIS but other courts are unable to participate, does this meet the requirement to have a bi-directional data exchange with courts per paragraph 1355.52(e)(2)(v)?
- A:** It depends. Title IV-E agencies may present a business case in an Advance Planning Document (APD) describing the circumstances rendering a data exchange impracticable. For example, if some courts participated in the data exchange while others did not, ACF would consider a business case explaining that the partial exchange met the requirements under 1355.52(e)(2)(v).

Source: 11/07/16

Reference: 45 CFR 1355.52(e)(2); 81 FR 35450 at 35464 (issued June 2, 2016); 80 FR 48200 at 48212 - 48213 (issued August 11, 2016)

Child Welfare Policy Manual

7 *Q:* Are title IV-E agencies transitioning from a S/TACWIS or non-S/TACWIS system to CCWIS, required to implement data exchanges consistent with CCWIS design requirements of paragraph 1355.53(a)?

A: It depends. If the data exchange was developed prior to, or during the CCWIS transition period, it may be exempted from one or more of the CCWIS design requirements if the CCWIS project meets the requirements of paragraphs 1355.56(b) or (f)(1). If the data exchange was developed after the CCWIS transition period, then it must meet the CCWIS design requirements in order to qualify for CCWIS developmental cost allocation unless ACF approves, on a case-by-case basis, an alternative design proposed by a title IV-E agency that is determined by ACF to be more efficient, economical, and effective, pursuant to 1355.53(b)(2).

This question and answer is repeated in the Automated Functions Requirements section.

Source: 01/11/2017

Reference: 45 CFR 1355.53(b); 45 CFR 1355.57(a); 81 FR 35450 at 35470 and 35473 - 35474 (issued June 2, 2016); 80 FR 48200 at 48217 - 48218 and 48220 - 48221 (issued August 11, 2015)

Child Welfare Policy Manual

6.6A Financial systems

No questions and answers are available at this time.

6.6B Child welfare contributing agencies

- 1 Q:** Does paragraph 1355.52(e)(1)(ii) require a CCWIS to have real-time access to child welfare contributing agency (CWCA) databases?

A: No. Title IV-E agencies are not required to view CWCA databases in real-time.

Source: 11/07/16

Reference: 45 CFR 1355.52(e)(1)(ii); 81 FR 35450 at 35463 (issued June 2, 2016); 80 FR 48200 at 48212 (issued August 11, 2016)

- 2 Q:** Paragraph 1355.52(e)(1)(ii) requires CCWIS to have a data exchange with "Systems operated by child welfare contributing agencies that are collecting or using data described in paragraph (b) of this section, if applicable." What is the meaning of the phrase "if applicable"?

A: For paragraph 1355.52(e)(1)(ii), "if applicable" means that CCWIS must have a data exchange with a child welfare contributing agency (CWCA) if that CWCA uses a system other than CCWIS for child abuse and neglect investigations, placements, or child welfare case management. It is not applicable if a CWCA is entering data directly into a title IV-E agency's CCWIS.

Source: 11/07/16

Reference: 45 CFR 1355.52(e); 81 FR 35450 at 35463 (issued June 2, 2016); 80 FR 48200 at 48212 (issued August 11, 2016)

Child Welfare Policy Manual

- 3 **Q:** Is the title IV-E agency responsible for assuring the quality of data submitted by child welfare contributing agencies (CWCAs) to CCWIS, per paragraph 1355.52(e)(1)(ii)?

A: Yes. The title IV-E agency is responsible for assuring data quality in compliance with the requirements described in paragraph 1355.52(d).

Source: 11/07/16

Reference: 45 CFR 1355.52(d); 45 CFR 1355.52(e)(1)(ii); 81 FR 35450 at 35456 - 35461 and 35463 (issued June 2, 2016); 80 FR 48200 at 48208 - 48212 (issued August 11, 2016)

- 4 **Q:** If a county has a contract with a child welfare contributing agency (CWCA), may the required bi-directional data exchange with CCWIS "go through" a county system?

A: Yes, with ACF approval.

This question and answer is repeated in the external child welfare systems section.

Source: 4/24/2017

Reference: 45 CFR 1355.52(e)(1)(ii), (iv); 81 FR 35450 at 35463 - 35464 (issued June 2, 2016); 80 FR 48200 at 48212 (issued August 11, 2015); CWPM 6.1 #3 and 6.6D #1 and #2.

- 5 **Q:** How frequently must data be electronically exchanged between CCWIS and CWCA systems?

A: The title IV-E agency has discretion to determine the frequency of data exchanges that support the requirement to provide data in a timely manner, pursuant to paragraph 1355.52(d)(1)(i).

Source: 4/24/2017

Reference: 45 CFR 1355.52(d)(1)(i), (e)(1)(ii); 81 FR 35450 at 35456 - 35457 and 35463 - 35464 (issued June 2,

Child Welfare Policy Manual

2016); 80 FR 48200 at 48208 - 48209 and 48212 (issued August 11, 2015).

6.6C Title IV-E determinations

I Q: In order to qualify for CCWIS cost allocation, paragraph 1355.57(e)(1)(iii) requires that activities and automated functions must benefit federal, state or tribal funded participants in programs and allowable activities described in title IV-E of the Act to the title IV-E program. What programs and activities qualify for CCWIS cost allocation under paragraph 1355.57(e)(1)(iii)?

A: A title IV-E agency may cost allocate CCWIS activities and automated functions that benefit participants in programs such as foster care, adoption assistance or guardianship programs, pursuant to 1355.57(e)(1)(iii). Activities and automated functions supporting other health and human service programs, such as Temporary Assistance to Needy Families (TANF), Child Care, Child Support, Supplemental Nutrition Assistance Program (SNAP), Medicaid and related state or tribal health and human service programs do not qualify for CCWIS cost allocation pursuant to 1355.57(e)(1)(iii). If a title IV-E agency would like to include some other program not listed here, then the title IV-E agency may present a business case for allocating the cost of activities and automated functions benefiting such program in accordance with 1355.57(e)(1). ACF will review and determine the appropriate cost allocation in accordance with 45 CFR 95 Subpart F.

Source: 11/10/16

Reference: 45 CFR 1355.57(e)(1)(iii); 81 FR 35450 at 35475 (issued June 2, 2016); 80 FR 48220 at 48222 (issued August 11, 2015)

Child Welfare Policy Manual

6.6D External child welfare systems

1 Q: Paragraph 1355.52(e)(1)(iv) requires CCWIS to have a data exchange with "Each system external to CCWIS used by title IV-E agency staff to collect CCWIS data, if applicable." What is the meaning of the phrase "if applicable"?

A: For paragraph 1355.52(e)(1)(iv), "if applicable" means that CCWIS must have a data exchange with any external system used by agency staff to collect CCWIS data, however, it is not applicable if there are no such external systems.

Source: 11/07/16

Reference: 45 CFR 1355.52(e); 81 FR 35450 at 35463 (issued June 2, 2016); 80 FR 48200 at 48212 (issued August 11, 2016)

2 Q: Are child welfare information systems used by counties in county administered states required to have a bi-directional exchange with the state CCWIS under 1355.52(e)(1)(iv)?

A: Yes. Counties are political subdivisions of the state, and the single state title IV-E agency designated in the state's title IV-B and title IV-E plan supervises the administration of county administered title IV-B and IV-E programs. Section 471(a)(2) of the Social Security Act and 45 CFR 205.100 provide the authority and parameters by which a single state title IV-E agency may delegate the administration of the title IV-E program to the state's political subdivisions and local agencies or offices. Therefore, a county system external to CCWIS and used by title IV-E agency staff to collect CCWIS data must, per paragraph 1355.52(e)(1)(iv), have a bi-directional data exchange with CCWIS.

Source: 11/07/16

Reference: Section 471(a)(2) of the Social Security Act; 45 CFR 205.100; 45 CFR 1355.52(e)(1)(iv); 81 FR 35450 at 35453 and 35463 - 35464 (June 2, 2016); 80 FR 48200 at 48212 (issued August 11, 2016)

Child Welfare Policy Manual

- 3 **Q:** If a title IV-E agency operating a CCWIS wants to exchange data with the National Electronic Interstate Compact Enterprise (NEICE) Case Management System (CMS) is a bidirectional data exchange required, per paragraph 1355.52(e)(1)(iv)?

A: Yes. A bi-directional data exchange is required because the NEICE CMS is considered an external system to CCWIS, per paragraph 1355.52(e)(1)(iv).

Source: 11/07/16

Reference: 45 CFR 1355.52(e)(1)(iv); 81 FR 35450 at 35463 - 35464 (June 2, 2016); 80 FR 48200 at 48212 (issued August 11, 2016)

- 4 **Q:** Would a web-portal external to CCWIS that is used to enter information that is then sent to the National Electronic Interstate Compact Enterprise (NEICE) Clearinghouse comply with the CCWIS bi-directional data exchange requirements?

A: No. CCWIS bi-direction data exchanges must be capable of both sending data to, and receiving data from the other system. A web-portal used by child welfare workers only to access the NEICE Clearinghouse does not meet the automation requirements for CCWIS data exchanges.

Source: 11/07/16

Reference: 45 CFR 1355.52(e)(1)(iv); 81 FR 35450 at 35463 - 35464 (June 2, 2016); 80 FR 48200 at 48211 - 48212 (issued August 11, 2016); Action Transmittal ACF-OSS-05 (issued August 21, 1998)

- 5 **Q:** If a county has a contract with a child welfare contributing agency (CWCA), may the required bi-directional data exchange with CCWIS "go through" a county system?

A: Yes, with ACF approval. This question and answer is repeated in the child welfare contributing agencies section.

Child Welfare Policy Manual

Source: 4/24/2017

Reference: 45 CFR 1355.52(e)(1)(ii), (iv); 81 FR 35450 at 35463 - 35464 (issued June 2, 2016); 80 FR 48200 at 48212 (issued August 11, 2015); CWPM 6.1 #3 and 6.6D #1 and #2.

6 Q: How frequently must data be electronically exchanged between CCWIS and county child welfare information systems?

A: The title IV-E agency has discretion to determine the frequency of data exchanges that support the requirement to provide data in a timely manner, pursuant to paragraph 1355.52(d)(1)(i).

Source: 4/24/2017

Reference: 45 CFR 1355.52(d)(1)(i), (e)(1)(iv); 81 FR 35450 at 35456 - 35457 and 35463 - 35464 (issued June 2, 2016); 80 FR 48200 at 48208 - 48209 and 48212 (issued August 11, 2015).

7 Q: If a title IV-E agency modifies the National Electronic Interstate Compact Enterprise (NEICE) Case Management System (CMS) so it is integrated as an automated function in the CCWIS, is the modified and integrated NEICE CMS considered an external system requiring a bi-directional data exchange with CCWIS as described in paragraph 1355.52(e)(1)(iv)?

A: No. An automated function integrated into CCWIS is not considered an external system as described in paragraph 1355.52(e)(1)(iv).

Source: 02/12/2018

Reference: 45 CFR 1355.52(e)(1)(iv); 81 FR 35450 at 35463 – 35464 (June 2, 2016); 80 FR 48200 at 48211 – 48212 (issued August 11, 2016); Action Transmittal ACF-OSS-05 (issued August 21, 1998)

Child Welfare Policy Manual

6.6E Child abuse and neglect systems

1 Q: If automated functions that support the reporting and investigation of child abuse and neglect reside exclusively in a CCWIS, how must the title IV-E agency cost allocate development costs for those automated functions?

A: Pursuant to 1355.57(a) - (e), the title IV-E agency may allocate development costs using a CCWIS cost allocation methodology unless the automated functions in the CCWIS are:

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- Duplicated in other systems supporting the state or tribe's title IV-E or title IV-B programs, pursuant to 1355.57(a)(2)(ii) and (b)(2)(ii);

- Not used consistently by all child welfare users responsible for the area supported by the automatic function, pursuant to 1355.57(a)(2)(ii) and (b)(2)(ii);

- Unique child welfare related program functions (such as juvenile justice and adult protective services) not used by the title IV-E program, pursuant to 1355.57(e) and (f) and 45 CFR 95.631; and

- Common or unique functions benefiting other health and human service programs (such as child support, child care, Supplementary Nutritional Assistance Program, Temporary Assistance to Needy Families, Medicaid, courts and/or education programs), pursuant to 1355.57(e) and (f) and 45 CFR 95.631.

This question and answer is repeated in the Cost Allocation section.

Source: 10/26/2017

Reference: 45 CFR 95.631; 45 CFR 1355.52(e)(2)(i); 45 CFR 1355.57; 81 FR 35450 at 35473 - 35475 (issued June 2, 2016); 80 FR 48200 at 48213 and 48220 - 48222 (issued August 11, 2015)

2 Q: If automated functions that support the reporting and investigation of child abuse and neglect reside in an external system and are not duplicated in CCWIS, how must the agency cost allocate development costs for those automated functions?

Child Welfare Policy Manual

- A:** Pursuant to 1355.57(e), the title IV-E agency must allocate development costs using a non-CCWIS cost allocation methodology if the automated functions reside in an external system.

This question and answer is repeated in the Cost Allocation section.

Source: 10/26/2017

Reference: 45 CFR 95.631; 45 CFR 1355.52(e)(2)(i); 45 CFR 1355.57; 81 FR 35450 at 35473 - 35475 (issued June 2, 2016); 80 FR 48200 at 48213 and 48220 - 48222 (issued August 11, 2015)

- 3 Q:** If automated functions that support the reporting and investigation of child abuse and neglect reside in both a CCWIS and an external system, how must the agency cost allocate development costs for those automated functions?

- A:** Pursuant to 1355.57(e), the title IV-E agency must allocate development costs using a non-CCWIS cost allocation methodology if the automated functions reside in both a CCWIS and an external system. The duplicated development costs are allocated to the benefiting program or programs. All programs pay their share of an automated function under a non-CCWIS cost allocation methodology.

This question and answer is repeated in the Cost Allocation section.

Source: 10/26/2017

Reference: 45 CFR 95.631; 45 CFR 1355.52(e)(2)(i); 45 CFR 1355.57; 81 FR 35450 at 35473 - 35475 (issued June 2, 2016); 80 FR 48200 at 48213 and 48220 - 48222 (issued August 11, 2015)

Child Welfare Policy Manual

6.6F Title IV-A systems

No questions and answers are available at this time.

6.6G Title XIX eligibility systems

No questions and answers are available at this time.

6.6H Title XIX claims processing

1 Q: What data are title IV-E agencies required to maintain in CCWIS from the data exchange with the Medicaid Management Information System (MMIS), per paragraph 1355.52(e)(2)(iii)(B)?

A: Paragraph 1355.52(e)(2)(iii)(B) requires title IV-E agencies to maintain in CCWIS the available medical record information received from the MMIS, which would include the Medicaid claims history or, for those enrolled in managed care, provider encounter data.

Source: 11/07/16

Reference: 45 CFR 1355.52(e)(2)(iii)(B); 81 FR 35450 at 35465 (issued June 2, 2016); 80 FR 48200 at 48213 - 48214 (issued August 11, 2016)

2 Q: Does paragraph 1355.52(e)(2)(iii)(B) require a title IV-E agency to maintain a foster child's entire medical record in CCWIS?

A: No.

Source: 11/07/16

Reference: 45 CFR 1355.52(e)(2)(iii)(B); 81 FR 35450 at 35465 (issued June 2, 2016); 80 FR 48200 at 48213 - 48214 (issued August 11, 2016)

Child Welfare Policy Manual

3 **Q:** If the title IV-E agency already has a process in place to enter current health information on children in foster care into CCWIS, is the title IV-E agency still required to implement a data exchange between CCWIS and the Medicaid Management Information system?

A: Yes, to the extent practicable. The bi-directional data exchange is required to provide CCWIS with all relevant data to serve clients and improve outcomes, including information on prior medical services, such as immunization histories, therapies, and prescriptions. Although the title IV-E agency may already have access to some of this information, implementing a bi-direction data exchange also improves efficiency by reducing duplicate data entry and provides the state title XIX program with data collected by the title IV-E agency that it may use in serving foster children.

Source: 2/12/2018

Reference: 45 CFR 1355.52(e)(2)(iii)(B); 81 FR 35450 at 35461 and 35464 - 35465 (June 2, 2016); 80 FR 48200 at 48211 - 48214 (issued August 11, 2016)

6.6I Title IV-D systems

No questions and answers are available at this time.

6.6J Court systems

No questions and answers are available at this time.

6.6K Education systems

No questions and answers are available at this time.

6.7 Data exchange standard

1 **Q:** Is the title IV-E agency that is implementing a CCWIS project required to comply with the data exchange standard requirements of paragraph 1355.52(f) for data exchanges implemented before the rule's effective date of August 1, 2016?

A: Yes. Upon implementation of a CCWIS, the title IV-E agency must use a single data exchange

Child Welfare Policy Manual

standard with child welfare contributing agencies (CWCAs) and external systems as described in paragraph 1355.52(f), including exchanges that were implemented before the rule's effective date.

Source: 11/08/16

Reference: 45 CFR 1355.52(f); 81 FR 35450 at 35466 (issued June 2, 2016); 80 FR 48200 at 48215 - 48216 (issued August 11, 2016)

2 Q: Is a title IV-E agency required to specify the technology used to transfer data in the data exchange standard?

A: No. Paragraph 1355.52(f) requires the title IV-E agency to describe in the data exchange standard applicable data, definitions, formats, and other specifications. Although the data exchange standard may include specifications for the technology used to transfer data, it is not required.

Source: 11/08/16

Reference: 45 CFR 1355.52(f); 81 FR 35450 at 35466 (issued June 2, 2016); 80 FR 48200 at 48215 (issued August 11, 2016)

3 Q: Is a title IV-E agency required to specify a single communication protocol for the data exchange in the data exchange standard required by paragraph 1355.52(f)?

A: No. Paragraph 1355.52(f) requires the title IV-E agency to describe in the data exchange standard applicable data, definitions, formats, and other specifications. The title IV-E agency is not required to specify a single communication protocol.

Source: 11/08/16

Reference: 45 CFR 1355.52(f); 81 FR 35450 at 35466 (issued June 2, 2016); 80 FR 48200 at 48215 (issued August 11, 2016)

Child Welfare Policy Manual

4 Q: Who selects the data exchange standard required by paragraph 1355.52(f)? Is it a federal agency such as ACF, or does the state or tribe select the data exchange standard?

A: The state or tribe implementing the CCWIS selects the data exchange standard for its CCWIS project.

Source: 11/08/16

Reference: 45 CFR 1355.52(f); 81 FR 35450 at 35466 (issued June 2, 2016); 80 FR 48200 at 48215 (issued August 11, 2016)

5 Q: Can the title IV-E agency's data exchange standard change over time?

A: Yes, the data exchange standard can change over time. For example, standards often add nuanced and precise conditions to accommodate new and varied circumstances or expand to standardize new areas to address changing policies or practices. The title IV-E agency may change standards consistent with Advance Planning Document (APD) rules at 45 CFR 95.610(c)(2).

Source: 11/08/16

Reference: 45 CFR 1355.52(f); 81 FR 35450 at 35466 - 35467 (issued June 2, 2016); 80 FR 48200 at 48215 - 48216 (issued August 11, 2016)

6 Q: May child welfare contributing agencies (CWCAs) that have data exchange standards different from the title IV-E agency data exchange standard use their own standard when exchanging data with CCWIS?

A: No. Paragraph 1355.52(f) specifies a single data exchange standard for data exchanges with CWCAs and systems external to CCWIS used by title IV-E agency staff to collect CCWIS data.

Source: 11/08/16

Child Welfare Policy Manual

Reference: 45 CFR 1355.52(f); 81 FR 35450 at 35467 (issued June 2, 2016); 80 FR 48200 at 48215 - 48216 (issued August 11, 2016)

7 Q: Is a title IV-E agency required to ensure that a CWCA system exchanging data with a county agency's external child welfare information system uses the single data exchange standard pursuant to 1355.52(f)?

A: Yes. The title IV-E agency must ensure that CWCA systems comply with the data exchange standard required pursuant to 1355.52(f)(2), and support the efficient, economical, and effective administration of the title IV-B and IV-E plans, pursuant to 1355.52(a).

Source: 4/24/2017

Reference: 45 CFR 1355.52(a) and (f); 81 FR 35450 at 35453 - 35454 and 35466 - 35467 (issued June 2, 2016); 80 FR 48200 at 48206 and 48215 - 48216 (issued August 11, 2015)

8 Q: May a title IV-E agency switch from one data exchange standard to a different data exchange standard?

A: Yes, provided all bi-directional data exchanges described in paragraph 1355.52(f) use the same data exchange standard.

Source: 2/12/2018

Reference: 45 CFR 1355.52(f); 81 FR 35450 at 35466 - 35467 (June 2, 2016); 80 FR 48200 at 48215 - 48216 (issued August 11, 2016)

6.8 Title IV-E determinations

1 Q: Is a CCWIS required to contain the automated functions that determine title IV-E eligibility?

A: No. The automated functions that determine title IV-E eligibility may be:

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Child Welfare Policy Manual

- Wholly provided by the CCWIS;

- Wholly provided by another system such as a larger system that determines eligibility for multiple programs; or

- Provided by different systems that have different steps of the title IV-E eligibility determination process. For example, the automated support for determining if a child meets the AFDC requirements may be located in the system supporting the title IV-A program while the remaining automated support is in the CCWIS.

Source: 10/27/2016

Reference: 45 CFR 1355.52(g); 81 FR 35450 at 35467 (issued June 2, 2016); 80 FR 48200 at 48216 (issued August 11, 2015)

2 Q: May a title IV-E agency use two or more automated functions to support one part of title IV-E eligibility determinations, such as using one system to determine Aid to Families with Dependent Children (AFDC) eligibility for some children and another system to determine AFDC eligibility for the remaining children?

A: A state title IV-E agency operating a CCWIS is prohibited from using two or more automated functions to support one part of title IV-E eligibility determinations, per 1355.52(g)(1). A state title IV-E agency must use the same automated function or the same group of automated functions for all title IV-E eligibility determinations.

However, if it is not practicable to use a single automated function, or the same group of automated functions per 1355.52(g)(2), a tribal IV-E agency may use multiple automated functions or manual processes to support one part of the title IV-E eligibility determinations. For example, tribes are required by section 479B(c)(C)(ii)(II) of the Social Security Act to use the AFDC plan that was in effect on July 16, 1996 of the state in which the child resides at the time of removal from the home to determine if the child meets the AFDC eligibility requirement. This means that tribal title IV-E agencies may need to use the AFDC plan from different states for different children, depending on the child's location at the time of removal. Therefore, it may not be cost effective for tribal title IV-E agencies to build an automated function to accommodate AFDC eligibility requirements of all states from which tribal children may be removed.

Source: 10/27/2016

Child Welfare Policy Manual

Reference: 45 CFR 1355.52(g); 81 FR 35450 at 35467 (issued June 2, 2016); 80 FR 48200 at 48216 (issued August 11, 2015)

3 Q: Must CCWIS be the "system of record" for title IV-E eligibility determinations, since paragraph 1355.52(g) permits other information systems to support eligibility determinations?

A: Yes. CCWIS must maintain the calculated outcome of the title IV-E eligibility determination process including the data contributing to the determination of title IV-E eligibility per paragraph 1355.52(b)(1)(ii).

Source: 10/27/2016

Reference: 45 CFR 1355.52(g); 45 CFR 1355.52(b)(1)(ii); 81 FR 35450 at 35455 and 35467 (issued June 2, 2016); 80 FR 48200 at 48207 and 48216 (issued August 11, 2015)

4 Q: How must title IV-E eligibility data collected by other information system be transmitted to CCWIS?

A: Title IV-E eligibility data collected by other information systems must be provided to CCWIS via a bi-directional electronic data exchange, per paragraph 1355.52(e)(1)(iii).

Source: 10/27/2016

Reference: 45 CFR 1355.52(e)(1)(iii); 80 FR 48200 at 48212 (issued August 11, 2015)

6.8A State title IV-E determinations

No questions and answers are available at this time.

6.8B Tribal title IV-E determinations

No questions and answers are available at this time.

Child Welfare Policy Manual

6.9 Software provision

1 Q: Does paragraph 1355.52(h), which requires title IV-E agencies to provide a copy of the agency-owned software that is designed, developed, or installed with federal financial participation (FFP) and associated documentation to the designated federal repository, apply only to software developed once an agency implements a new CCWIS or transitions another system to CCWIS?

A: No. The title IV-E agency may be required to provide ACF software from legacy systems developed with FFP per 45 CFR 95.617(b).

Source: 10/27/2016

Reference: 45 CFR 1355.52(h); 45 CFR 95.617(b); 81 FR 35450 at 35467 (issued June 2, 2016); 80 FR 48200 at 48216 (issued August 11, 2015)

2 Q: In county administered states, may counties directly access software and associated documentation from the federal repository described in paragraph 1355.52(h) or must the state title IV-E agency make such a request?

A: County administered agencies may ask that the state title IV-E agency request software and associated documentation from the federal repository. Title IV-E agencies must receive federal approval to provide the materials to the county administered agency.

Source: 10/27/2016

Reference: 45 CFR 1355.52(h); 81 FR 35450 at 35467 (issued June 2, 2016); 80 FR 48200 at 48216 (issued August 11, 2015)

Child Welfare Policy Manual

3 Q: Must title IV-E agencies submit commercial off-the-shelf (COTS) products or third party utilities to the federal repository described in paragraph 1355.52(h)?

A: No. Agencies are not required to submit these products because ACF is not granted a license to COTS products or third party utilities that are not owned by the title IV-E agency per 45 CFR 95.617.

However, COTS software enhanced or modified with federal financial participation is owned by the title IV-E agency. This includes extensions to connect the COTS product to, or use it with other modules of the CCWIS. ACF has regulatory authority to add these products to the federal registry.

Source: 10/27/2016

Reference: 45 CFR 1355.52(h); 45 CFR 95.617; 81 FR 35450 at 35467 (issued June 2, 2016); 80 FR 48200 at 48216 (issued August 11, 2015)

4 Q: Must title IV-E agencies provide automated functions that support multiple programs within an agency to ACF for inclusion in the federal repository described in paragraph 1355.52(h)?

A: It depends. If an automated function is designed, developed, or installed with any federal financial participation (FFP), ACF has the regulatory authority to add it to the federal repository per paragraph 1355.52(h).

Source: 10/27/2016

Reference: 45 CFR 1355.52(h); 81 FR 35450 at 35467 (issued June 2, 2016); 80 FR 48200 at 48216 (issued August 11, 2015)

Child Welfare Policy Manual

- 5 **Q:** If a title IV-E agency provided agency-owned software and documentation to the federal repository described at 1355.52(h), is the agency required to provide updates made to the software or documentation to the federal repository?

A: Yes, if ACF requests the updated software or documentation, pursuant to 1355.52(h).

Source: 10/25/2017

Reference: 45 CFR 1355.52(h); 81 FR 35450 at 35467 (issued June 2, 2016); 80 FR 48200 at 48216 (issued August 11, 2015)

- 6 **Q:** If a title IV-E agency receives a copy of software from the federal repository and enhances it, is the agency required to provide the enhanced software to the federal repository?

A: Yes, if ACF requests the enhanced software, pursuant to 1355.52(h).

Source: 10/25/2017

Reference: 45 CFR 1355.52(h); 81 FR 35450 at 35467 (issued June 2, 2016); 80 FR 48200 at 48216 (issued August 11, 2015)

- 7 **Q:** If ACF requests that a title IV-E agency provide the federal repository with an automated function requiring a specific configuration to run (such as a specific database product or interfaces to proprietary products), is the agency required to provide the configuration requirements to the federal repository?

A: Yes. The title IV-E agency is required to provide a copy of the agency-owned software and associated documentation pursuant to 1355.52(h).

Source: 10/25/2017

Reference: 45 CFR 1355.52(h); 81 FR 35450 at 35467 (issued June 2, 2016); 80 FR 48200 at 48216 (issued August 11, 2015)

Child Welfare Policy Manual

8 Q: Is a title IV-E agency required to provide proprietary products to the federal repository when it provides the agency-owned software?

A: No. Title IV-E agencies are not required to submit proprietary products when submitting agency-owned software to the federal repository pursuant to 45 CFR 95.617(c).

Source: 10/25/2017

Reference: 45 CFR 1355.52(h); 45 CFR 95.617; 81 FR 35450 at 35467 (issued June 2, 2016); 80 FR 48200 at 48216 (issued August 11, 2015); CWPM 6.9 #3

9 Q: May ACF add vendor owned software products to the federal repository described in paragraph 1355.52(h)?

A: No. ACF will only add software and associated documentation that is owned by a title IV-E agency and designed, developed, or installed with federal financial participation to the federal repository, pursuant to paragraph 1355.52(h).

Source: 2/12/2018

Reference: 45 CFR 1355.52(h); 81 FR 35450 at 35467 (issued June 2, 2016); 80 FR 48200 at 48216 (issued August 11, 2015)

10 Q: Must title IV-E agencies provide open source software to the federal repository upon ACF's request, pursuant to paragraph 1355.52(h)?

A: Yes. Upon ACF request, title IV-E agencies must provide open source software that was designed, developed, or installed with federal financial participation to the federal repository.

Source: 2/12/2018

Child Welfare Policy Manual

Reference: 45 CFR 1355.52(h); 81 FR 35450 at 35467 (issued June 2, 2016); 80 FR 48200 at 48216 (issued August 11, 2015)

6.10 Submission

No questions and answers are available at this time.

6.10A Initial submission

1 Q: If the agency elects not to transition a S/TACWIS project to a CCWIS, is the title IV-E agency required to submit the documents listed in paragraph 1355.52(i)(1) to ACF when submitting an Advance Planning Document (APD) or Notice of Intent during the transition period?

A: No. A record from the title IV-E agency signed by the governor, tribal leader, or designated state or tribal official notifying ACF that the title IV-E agency elects not to transition a S/TACWIS project to a CCWIS project is sufficient. However, the IV-E agency must continue to submit applicable APDs for the non-CCWIS project.

Source: 10/27/2016

Reference: 45 CFR 95 Subpart F; 45 CFR 1355.51; 45 CFR 1355.52(i)(1); 45 CFR 1355.56(d)(1) 81 FR 35450 at 35467 - 35468 and 35473 (issued June 2, 2016); 80 FR 48200 at 48205, 48216 - 48217, and 48220 (issued August 11, 2015)

2 Q: What is the "start date" of a CCWIS project?

A: The start date of a CCWIS project is the date ACF indicates in its response letter to an approvable submission from the title IV-E agency.

Source: 10/27/2016

Reference: 45 CFR 95 Subpart F; 45 CFR 1355.51; 45 CFR 1355.52(i)(1); 81 FR 35450 at 35467 - 35468 (issued June 2, 2016); 80 FR 48220 at 48205 and 48216 - 48217 (issued August 11, 2015)

Child Welfare Policy Manual

3 **Q:** What documents must a title IV-E agency submit when notifying ACF that the agency intends to build a CCWIS?

A: The submission must meet the requirements of 1355.52(i)(1), which means that the title IV-E agency must submit an Advance Planning Document (APD) or, if below the APD submission thresholds defined at 45 CFR 95.611, a Notice of Intent. The APD or Notice of Intent must include:

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- A description of how the CCWIS will meet the requirements in 1355.52 (a) through (h) and, if applicable 1355.54;

- A list of all automated functions included in the CCWIS; and

- A notation of whether each automated function included in the CCWIS meets, or when implemented will meet, the following requirements:

- The automated function supports at least one requirement of 1355.52 or, if applicable, 1355.54;

- The automated function is not duplicated within the CCWIS or systems supporting child welfare contributing agencies and is consistently used by all child welfare users responsible for the area supported by the automated function; and

- The automated function complies with the CCWIS design requirements at 1355.53(a), unless exempted in accordance with 1355.53(b).

Source: 10/27/2016

Reference: 45 CFR 95 Subpart F; 45 CFR 1355.51; 45 CFR 1355.52(i)(1); 81 FR 35450 at 35467 - 35468 (issued June 2, 2016); 80 FR 48220 at 48205 and 48216 - 48217 (issued August 11, 2015)

4 **Q:** Does paragraph 1355.52(i)(1)(iii)(B) require a title IV-E agency that elects to allow Child Welfare Contributing Agencies to use their systems to note if a CCWIS automated function is duplicated in a system used by a contract service provider?

Child Welfare Policy Manual

- A:** Yes, if the contract service provider meets the definition of a child welfare contributing agency, any automated functions in the provider's system that duplicate automated functions in CCWIS must be included in the automated function list described in paragraph 1355.52(i)(1)(ii). Per section 1355.51, a child welfare contributing agency is a public or private entity that, by contract or agreement with the title IV-E agency, provides child abuse and neglect investigations, placement, or child welfare case management (or any combination of these) to children and families.

Source: 10/27/2016

Reference: 45 CFR 1355.51; 45 CFR 1355.52(i)(1); 81 FR 35450 at 35453 and 35468 (issued June 2, 2016); 80 FR 48220 at 48205 and 48216 - 48217 (issued August 11, 2015)

- 5 Q:** When notifying ACF that a title IV-E agency intends to transition an existing S/TACWIS or non-S/TACWIS to CCWIS, does paragraph 1355.52(i)(1)(ii) require the agency to list existing automated functions of the transitioning system that will be used in the CCWIS?

- A:** Yes. The list includes existing automated functions of the transitioning system that will be used in the CCWIS as well as newly developed automated functions that will be part of the CCWIS. Providing this list in addition to the more detailed information required in paragraph 1355.52(i)(1)(iii) at the start of a CCWIS project will help both ACF and the title IV-E agency to more reliably estimate project costs.

Source: 10/27/2016

Reference: 45 CFR 1355.52(i)(1); 80 FR 48220 at 4648216 - 48217 (issued August 11, 2015)

- 6 Q:** When a title IV-E agency submits an Advance Planning Document (APD) notifying ACF of the agency's plan to implement a CCWIS, is the agency required to include the description of how the planned system will meet the CCWIS requirements and the automated function list as separate documents?

- A:** No. While the title IV-E agency is required to include the system description and automated function list as specified in 1355.52(i)(1)(i) - (iii) when submitting an APD notifying ACF of the agency's plan to implement a CCWIS, the information may be integrated into the APD project

Child Welfare Policy Manual

documentation described at 45 CFR 95.610.

Source: 2/12/2018

Reference: 45 CFR 95.610; 45 CFR 1355.52(i)(1); 81 FR 35450 at 35467 - 35468 (issued June 2, 2016); 80 FR 48200 at 48216 - 48217 (issued August 11, 2015)

6.10B On-going submission

No questions and answers are available at this time.

6.11 Other APD requirements

1 Q: Which Advance Planning Document (APD) regulations apply to CCWIS projects below the APD thresholds described at 45 CFR 95.611?

A: A title IV-E agency claiming title IV-E federal financial participation (FFP) for CCWIS projects below the APD submission thresholds at 45 CFR 95.611 is subject to certain portions of the APD rules that are necessary for effective project management per paragraph 1355.52(j), including:

<ul style="list-style-type:Disc; margin-left: 2em;">

 95.613 - Procurement standards;

 95.615 - Access to systems and records;

 95.617 - Software and ownership rights;

 95.619 - Use of Automated Data Processing (ADP) systems;

 95.621 - Automated Data Processing (ADP) Reviews;

Child Welfare Policy Manual

 95.626 - Independent Verification and Validation;

 95.627 - Waivers;

 95.631 - Cost identification for purpose of FFP claims;

 95.633 - Nondiscrimination requirements;

 95.635 - Disallowance of FFP for automated systems that fail to comply substantially with requirements; and

 95.641 - Applicability of rules for charging equipment in Subpart G.

Source: 11/09/16

Reference: 45 CFR 95, Subpart F; 45 CFR 1355.52(j); 80 FR 48200 at 48217 (issued August 11, 2016)

2 Q: Which Advance Planning Document (APD) regulations apply to CCWIS projects at or above the APD thresholds described at 45 CFR 95.611?

A: CCWIS projects claiming title IV-E federal financial participation (FFP) with costs above the thresholds in 45 CFR 95.611 (currently \$5 million total project cost) continue to be subject to all of the provisions of 45 CFR part 95, subpart F, including submission of APDs. For these over threshold projects, application of the APD rules does not change.

Source: 11/07/16

Reference: 45 CFR 95, Subpart F; 45 CFR 1355.30(k); 45 CFR 1355.52(j); 80 FR 48200 at 48217 (issued August 11, 2016)

Child Welfare Policy Manual

6.12 Design requirements

1 Q: Are title IV-E agencies that transition S/TACWIS and non-S/TACWIS systems to CCWIS required to rebuild existing system components to comply with the CCWIS design requirements?

A: No. Paragraph 1355.53(b)(1) exempts CCWIS automated functions from one or more of the CCWIS design requirements in paragraph 1355.53(a) if the CCWIS project meets the submission requirements of paragraph 1355.56(b) or paragraph 1355.56(f)(1). This will reduce the costs of transitioning these systems to CCWIS.

Source: 01/11/2017

Reference: 45 CFR 1355.53; 81 FR 35450 at 35468 - 35469 (issued June 2, 2016); 80 FR 48200 at 48217 - 48218 (issued August 11, 2015)

6.12A Automated function requirements

1 Q: If the title IV-E agency uses commercial-off-the-shelf (COTS) software or a Software-as-a-Service (SaaS) system owned or maintained by a vendor, must it meet the CCWIS design requirements of paragraph 1355.53(a)?

A: No. Paragraph 1355.53(a) does not apply to proprietary COTS or SaaS systems owned or maintained by vendors. Federal financial participation is not available to develop proprietary COTS products or SaaS systems pursuant to 45 CFR 95.617(c), therefore, they are not required to be developed in accordance with the design requirements at 1355.53(a).

Source: 01/11/2017

Reference: 45 CFR 1355.53; 81 FR 35450 at 35470 (issued June 2, 2016); 80 FR 48200 at 48217 - 48218 (issued August 11, 2015)

Child Welfare Policy Manual

2 Q: May a title IV-E agency propose an alternative design for their CCWIS that does not meet one or more of the CCWIS design requirements of paragraph 1355.53(a)?

A: Yes. A title IV-E agency may propose an alternative CCWIS design for ACF review pursuant to paragraph 1355.53(b)(2). If ACF determines that the alternative design is more efficient, economical, and effective than what is found in paragraph 1355.53(a), then the CCWIS automated function may be exempted from one or more of the CCWIS design requirements of paragraph 1355.53(a).

Source: 01/11/2017

Reference: 45 CFR 1355.53; 81 FR 35450 at 35470 (issued June 2, 2016); 80 FR 48200 at 48217 - 48218 (issued August 11, 2015)

3 Q: Are title IV-E agencies transitioning from a S/TACWIS or non-S/TACWIS system to CCWIS, required to implement data exchanges consistent with CCWIS design requirements of paragraph 1355.53(a)?

A: It depends. If the data exchange was developed prior to, or during the CCWIS transition period, it may be exempted from one or more of the CCWIS design requirements if the CCWIS project meets the requirements of paragraphs 1355.56(b) or (f)(1). If the data exchange was developed after the CCWIS transition period, then it must meet the CCWIS design requirements in order to qualify for CCWIS developmental cost allocation unless ACF approves, on a case-by-case basis, an alternative design proposed by a title IV-E agency that is determined by ACF to be more efficient, economical, and effective, pursuant to 1355.53(b)(2).

This question and answer is repeated in the Data Exchanges section.

Source: 01/11/2017

Reference: 45 CFR 1355.53(b); 45 CFR 1355.57(a); 81 FR 35450 at 35470 and 35473 - 35474 (issued June 2, 2016); 80 FR 48200 at 48217 - 48218 and 48220 - 48221 (issued August 11, 2015)

Child Welfare Policy Manual

4 Q: We understand that a title IV-E agency that is transitioning from a S/TACWIS to CCWIS receives S/TACWIS development funding for automated functions developed during the transition period per paragraph 1355.56(a), regardless of whether the automated function meets the CCWIS design requirements of paragraph 1355.53(a). However, if the title IV-E agency has not completed developing the automated function by the end of the transition period, may the title IV-E agency continue to receive CCWIS development funding for completing work on the automated function after the transition period?

A: It depends. All development of automated functions done after the transition period on a S/TACWIS transitioning to CCWIS must meet the CCWIS design requirements of paragraph 1355.53(a) unless, pursuant to paragraph 1355.53(b)(2), ACF determines that the alternative design proposed by the agency is more efficient, economical, and effective than the CCWIS design requirements. If ACF makes such a determination, the automated functions may qualify for CCWIS development cost allocation.

Source: 01/11/2017

Reference: 45 CFR 1355.53; 45 CFR 1355.57(a) and (e); 81 FR 35450 at 35470 and 35473 - 35475 (issued June 2, 2016); 80 FR 48200 at 48217 - 48218 and 48220 - 48222 (issued August 11, 2015)

5 Q: Must a title IV-E agency design CCWIS automated functions to reside on specific hardware, such as individual user workstations?

A: No. The CCWIS design requirements at 1355.53(a) do not specify how automated functions must be configured.

Source: 10/25/2017

Reference: 45 CFR 1355.53(a); 81 FR 35450 at 35468 - 35470 (issued June 2, 2016); 80 FR 48200 at 48217 - 48218 (issued August 11, 2015)

Child Welfare Policy Manual

6 Q: If the title IV-E agency uses an automated function that allow users to access CCWIS from other devices, such as mobile phones, would those functions qualify for CCWIS development cost allocation?

A: Yes, provided the automated function is documented in the automated function list pursuant to 1355.52(i)(1)(ii) - (iii), and:

1. is included in the CCWIS;

2. supports at least one requirement of section 1355.52 or, if applicable section 1355.54;

3. is not duplicated within the CCWIS or systems supporting child welfare contributing agencies and is consistently used by all child welfare users responsible for the area supported by the automated function; and

4. complies with the CCWIS design requirements of paragraph 1355.53(a), unless exempted in accordance with paragraph 1355.53(b).

Source: 2/12/2018

Reference: 45 CFR 95.610; 45 CFR 1355.52(i)(1); 45 CFR 1355.53; 81 FR 35450 at 35467 - 35471 (issued June 2, 2016); 80 FR 48200 at 48216 - 48218 (issued August 11, 2015)

Child Welfare Policy Manual

7 **Q:** If ACF approves a title IV-E agency's plan to transition an existing system to CCWIS prior to July 31, 2018, must all development work done after ACF's approval comply with the CCWIS design requirements of 1355.53(a)?

A: No. A title IV-E agency's compliance with CCWIS design requirements is based on the transition period end date of July 31, 2018, not the date of ACF's approval of the plan to transition an existing system to CCWIS.

Development work completed on a transitioning system on or before July 31, 2018 is exempt from the CCWIS design requirements of paragraph 1355.53(a).

Development work performed on a transitioning system after July 31, 2018 must meet the CCWIS design requirements unless exempted by 1355.53(b)(2), pursuant to paragraph 1355.57(a).

This question and answer is repeated in the transition period section.

Source: 2/12/2018

Reference: 45 CFR 1355.52(i)(1); 45 CFR 1355.53; 45 CFR 1355.57(a); 81 FR 35450 at 35467 - 35471 and 35473 - 35474 (issued June 2, 2016); 80 FR 48200 at 48216 - 48218 and 48220 - 48221 (issued August 11, 2015)

Child Welfare Policy Manual

8 Q: Must a title IV-E agency apply for a waiver to receive federal financial participation (FFP) if it wants to use commercial-off-the-shelf (COTS) software products described in paragraph 45 CFR 95.617(c)?

A: Yes. In order to receive FFP for COTS products described in paragraph 45 CFR 95.617(c), the agency must request a waiver pursuant to 45 CFR 95.627.

Source: 2/12/2018

Reference: 45 CFR 1355.30(k); 45 CFR 1355.52(j); 45 CFR 95.617(c); 45 CFR 95.627; 80 FR 48200 at 48217 (issued August 11, 2015)

6.12A.1 Modularity

No questions and answers are available at this time.

6.12A.2 Plain language

No questions and answers are available at this time.

6.12A.3 Development standard

1 Q: Is a title IV-E agency required to use one development standard for all automated functions per paragraph 1355.53(a)(3) (which could limit the agency's flexibility in implementing CCWIS) or is it permissible for the title IV-E agency to use different development standards for different automated functions?

A: The title IV-E agency is required per paragraph 1355.53(a)(3) to use a single development standard. However, title IV-E agencies may select a development standard that accommodates variations in their development approach. For example, the development standard may apply certain requirements for one set of conditions and other requirements for other conditions.

Source: 01/11/2017

Reference: 45 CFR 1355.53; 81 FR 35450 at 35470 (issued June 2, 2016); 80 FR 48200 at 48217 - 48218 (issued August 11, 2015)

Child Welfare Policy Manual

6.12A.4 Reuse

1 Q: Paragraph 1355.53(a)(4) requires that automated functions are "capable of being shared"? What are the processes by which title IV-E agencies share components?

A: There are two general processes by which title IV-E agencies may share components.

First, ACF may request software and associated documents for the federal repository per requirements at paragraph 1355.52(h). ACF may then share these products with title IV-E agencies at the agency's request.

Second, title IV-E agencies may directly share products with other agencies.

Source: 01/11/2017

Reference: 45 CFR 1355.53; 81 FR 35450 at 35470 (issued June 2, 2016); 80 FR 48200 at 48217 - 48218 (issued August 11, 2015)

2 Q: Paragraph 1355.53(a)(4) requires that automated functions be capable of reuse. Does this mean title IV-E agencies are required to make automated functions "plug and play"?

A: No, paragraph 1355.53(a)(4) does not require title IV-E agencies to make automated functions adaptable to different hardware configurations without manual configuration (plug and play).

Source: 01/11/2017

Reference: 45 CFR 1355.53; 81 FR 35450 at 35470 (issued June 2, 2016); 80 FR 48200 at 48217 - 48218 (issued August 11, 2015)

Child Welfare Policy Manual

3 Q: If ACF places a CCWIS automated function in the federal repository described in paragraph 1355.52(h) and it is not selected by another agency for re-use, does that mean the automated function did not comply with the reuse requirement of paragraph 1355.53(a)(4)?

A: No. Paragraph 1355.53(a)(4) requires that automated functions be "capable of being shared, leveraged, and reused." The regulation does not require modules be reused when it is not appropriate, such as when a module does not support an agency's business processes.

Source: 01/11/2017

Reference: 45 CFR 1355.53; 81 FR 35450 at 35470 (issued June 2, 2016); 80 FR 48200 at 48217 - 48218 (issued August 11, 2015)

6.12B Design waivers

No questions and answers are available at this time.

6.13 CCWIS options

1 Q: Are all CCWIS data exchanges required to be bi-directional?

A: No. Paragraph 1355.52(e) requires eleven mandatory bi-directional data exchanges. However, optional data exchanges approved by ACF pursuant to section 1355.54 may be uni-directional data exchanges. Exchanges benefiting the title IV-B or IV-E programs may be eligible for CCWIS funding, but exchanges not benefiting the title IV-B or IV-E programs must be cost allocated to the benefiting program or programs.

Source: 4/24/2017

Reference: 45 CFR 1355.54; 81 FR 35450 at 35471 (issued June 2, 2016); 80 FR 48200 at 48218 - 48219 (issued August 11, 2015)

Child Welfare Policy Manual

- 2 **Q:** May title IV-E agencies establish data exchanges with private entities that are not defined as child welfare contributing agencies (CWCAs), such as providers of substance abuse, mental health and other treatment services pursuant to section 1355.54?

A: Yes, with ACF approval.

Source: 4/24/2017

Reference: 45 CFR 1355.54; 81 FR 35450 at 35453 and 35471 (issued June 2, 2016); 80 FR 48200 at 48218 - 48219 (issued August 11, 2015)

- 3 **Q:** May title IV-E agencies build data exchanges with other Federal entities such as the Social Security Administration or with state or tribal agencies, such as departments of labor and employment pursuant to section 1355.54?

A: Yes, with ACF approval.

Source: 4/24/2017

Reference: 45 CFR 1355.54; 81 FR 35450 at 35471 (issued June 2, 2016); 80 FR 48200 at 48218 - 48219 (issued August 11, 2015)

- 4 **Q:** Are state title IV-E agencies required to build electronic data exchanges with federally recognized Indian tribes to comply with the requirements of paragraph 1355.52(b)(3) regarding the Indian Child Welfare Act (ICWA)?

A: No. State title IV-E agencies are not required to build a data exchange between CCWIS and federally recognized Indian tribes. However, a state title IV-E agency may propose such a data exchange for ACF approval pursuant to section 1355.54.

Source: 4/24/2017

Reference: 45 CFR 1355.52(b)(3); 45 CFR 1355.54; 45 CFR 1355.57; 81 FR 35450 at 35455, 35471 and 35473 -

Child Welfare Policy Manual

35475 (issued June 2, 2016); 80 FR 48200 at 48207 - 48208, 48218 - 48219, and 48220 - 48222 (issued August 11, 2015)

5 **Q:** How must the title IV-E agency cost allocate development, operational and equipment costs for portions of a CCWIS that benefit the juvenile justice program?

A: Pursuant to 1355.57 (e) and (f) and as described at 80 FR 48200 at 48220, development costs that benefit both the title IV-E program and the juvenile justice program may be allocated to the title IV-E program.

Pursuant to 1355.57 (e) and (f) and 45 CFR 95.631(a), development costs must be allocated to the juvenile justice program for:

-

- Enhancements made to automated functions benefitting a juvenile justice program, but not the title IV-E program.

- Automated functions only benefitting the juvenile justice program.

-

Pursuant to 45 CFR 95.631(b), operational costs may be allocated to the title IV-E program in proportion to the use of the CCWIS by the title IV-E program versus use by the juvenile justice program. Operational costs must be allocated to the juvenile justice program in proportion to the use of the system to support the non-title IV-E juvenile justice program.

Equipment costs are allocated to the title IV-E program in proportion to its use by workers of the title IV-E program versus the juvenile justice program.

Source: 10/26/2017

Reference: 45 CFR 1355.54; 45 CFR 1355.57; 45 CFR 95.631 81 FR 35450 at 35471 and 35473 - 35475 (issued June 2, 2016); 80 FR 48200 at 48218 - 48222 (issued August 11, 2015)

Child Welfare Policy Manual

6 Q: If a title IV-E agency elects to support the Interstate Compact on the Placement of Children (ICPC) with a bi-directional data exchange between CCWIS and the National Electronic Interstate Compact Enterprise (NEICE) Clearinghouse, must this data exchange comply with the single data exchange standard requirements of 1355.52(f)?

A: No. Only CCWIS bi-directional data exchanges with child welfare contributing agencies (CWCAs) and/or external systems used by IV-E agency staff to collect CCWIS data are required to comply with the single data exchange standard requirements of 1355.52(f). The NEICE Clearinghouse is not a CWCA, as defined at paragraph 1355.51, because the Clearinghouse does not provide the services of "child abuse and neglect investigations, placement, or child welfare case management (or any combination of these) to children and families." The Clearinghouse is not an external system as described in the regulation at 1355.52(e)(1)(iv) because it lacks features that enable workers to directly enter CCWIS data.

Source: 2/12/2018

Reference: 45 CFR 1355.51; 45 CFR 1355.52(e)(1)(iv); 45 CFR 1355.52(f); 81 FR 35450 at 35453, 35461 - 35464, and 35466 - 35467 (issued June 2, 2016); 80 FR 48200 at 48205, 48211 - 48212, and 48215 - 48216 (issued August 11, 2015)

6.14 CCWIS reviews

1 Q: Will ACF review CCWIS projects over Advance Planning Document (APD) thresholds and CCWIS projects under these thresholds in accordance with the same review and assessment process described in section 1355.55?

A: Yes. ACF will review, assess and inspect the planning, design, development, installation, operation and maintenance of each CCWIS project on a continuing basis to determine the extent to which the project meets CCWIS requirements, regardless of whether the project was over or under the \$5 million APD threshold.

Source: 4/24/2017

Reference: 45 CFR 95.611, 45 CFR 1355.55; 81 FR 35450 at 35471 (issued June 2, 2016); 80 FR 48200 at 48219 (issued August 11, 2015)

Child Welfare Policy Manual

2 **Q:** What data quality metrics will ACF use during the CCWIS reviews described at paragraph 1355.55?

A: ACF will use the standards in federal laws, regulations, and policies for evaluating data quality for federally required data described in section 1355.52(b)(1). We will apply the standards established by the state or tribe when evaluating the quality of required data described in section 1355.52 (b)(2). If two or more standards apply to the same data, ACF will apply the more rigorous standard, per 1355.52(d)(1)(i) in reviewing data quality. For example, if one standard required updating certain CCWIS data in seven days and a second standard set a two-day limit, we will hold the title IV-E agency to the two-day limit.

Source: 4/24/2017

Reference: 45 CFR 1355.52(b)(1) - (2); 1355.52(d)(1); 45 CFR 1355.55; 81 FR 35450 at 35454 - 35455, 35457 and 35471 (issued June 2, 2016); 80 FR 48200 at 48207 - 48209 and 48219 (issued August 11, 2015)

3 **Q:** Will ACF conduct CCWIS reviews as described in section 1355.55 solely based on the title IV-E agency's CCWIS data quality plan submitted per paragraph 1355.52(d)(5)?

A: No. During a CCWIS review described by section 1355.55, ACF will review the extent to which the CCWIS project meets requirements in sections 1355.52, 1355.53, 1355.56, and, if applicable, 1355.54 which will include, but is not limited to a review of the title IV-E agency's data quality plan.

Source: 4/24/2017

Reference: 45 CFR 1355.52(d)(5); 45 CFR 1355.55; 81 FR 35450 at 35460 - 35461 and 35471 (issued June 2, 2016); 80 FR 48200 at 48211 and 48219 (issued August 11, 2015)

Child Welfare Policy Manual

4 Q: Are title IV-E agencies required to conduct an independent verification and validation (IV&V) review for CCWIS design, implementation, and data quality reviews as part of the CCWIS review process?

A: No. Section 1355.55 does not specifically require title IV-E agencies to conduct an IV&V review as part of the CCWIS review process. However, ACF may require a title IV-E agency to complete an IV&V per Advance Planning Document (APD) regulations at 45 CFR 95.626.

Source: 4/24/2017

Reference: 45 CFR 95.626; 45 CFR 1355.55; 81 FR 35450 at 35471 - 35472 (issued June 2, 2016); 80 FR 48200 at 48219 (issued August 11, 2015)

6.15 Transition Period

1 Q: What requirements must a title IV-E agency with a S/TACWIS meet if the agency does not build a CCWIS?

A: A title IV-E agency with a S/TACWIS project that elects not to transition to a CCWIS must:

1. notify ACF by July 31, 2018 in an Advance Planning Document (APD) or Notice of Intent that it will not transition the S/TACWIS project to CCWIS; and
2. continue to use the S/TACWIS through its life expectancy in accordance with 45 CFR 95.619.

The title IV-E agency must also continue to meet the APD requirements at 45 CFR 95, Subpart F per 1355.30(k).

Source: (9/14/16)

Reference: 45 CFR 95, Subpart F; 45 CFR 1355.30(k); 45 CFR 1355.56(d); 81 FR 35450 at 35473 (June 2, 2016); 80 FR 48200 at 48220 (August 11, 2015)

Child Welfare Policy Manual

2 Q: What are the consequences if a title IV-E agency with a S/TACWIS fails to notify ACF by July 31, 2018 that the agency will not transition to CCWIS?

A: The title IV-E agency may be subject to recoupment of all title IV-E funds for the project per 45 1355.56(e)

Source: (9/14/16)

Reference: 45 CFR 1355.56(e); 45 CFR 1358; 45 CFR 95.635(b); 81 FR 35450 at 35473 (June 2, 2016); 80 FR 48200 at 48220 and 48222 (August 11, 2015)

3 Q: Are CCWIS projects subject to all Advance Planning Document (APD) regulations at 45 CFR 95 Subpart F?

A: It depends on whether the CCWIS project is at, above, or below the APD thresholds.
CCWIS projects at or above the APD thresholds at 45 CFR 95.611 are subject to all the APD regulations at 45 CFR 95 Subpart F.
CCWIS projects below the APD thresholds at 45 CFR 95.611 are subject to only the APD regulations at 45 CFR 95.613 through 95.621 and 95.626 through 95.641.

Source: (9/14/16)

Reference: 45 CFR 1355.30(k); 45 CFR 1355.52(j); 80 FR 48200 at 48217 (August 11, 2015)

4 Q: Is there specific language that a title IV-E agency must use to notify ACF that the agency does not intend to transition a S/TACWIS to CCWIS?

A: No. 1355.56(d) requires the agency to notify ACF in an APD or Notice of Intent submitted during the transition period that the agency does not elect to transition a S/TACWIS project to CCWIS. The required notification must convey the message that the IV-E agency does not elect to transition the S/TACWIS project to CCWIS.

Child Welfare Policy Manual

Source: (9/14/16)

Reference: 45 CFR 1355.56(d)(1); 81 FR 35450 at 35473 (issued June 2, 2016)

5 Q: What requirements must a title IV-E agency with a non-S/TACWIS meet if the agency does not build a CCWIS?

A: The title IV-E agency must continue to meet the APD requirements at 45 CFR 95, Subpart F.

Source: (9/14/16)

Reference: Section 474(a)(C) of title IV-E of the Social Security Act

6 Q: Are there financial consequences for using a former S/TACWIS as a non-CCWIS beyond the 24 month transition period ending on July 31, 2018?

A: It depends. There are no consequences in the CCWIS regulations for using a former S/TACWIS as a non-CCWIS provided the title IV-E agency:

- >notifies ACF by July 31, 2018 in an APD or Notice of Intent, that it will not transition the S/TACWIS project to CCWIS; and

- continues to use the S/TACWIS through its life expectancy in accordance with 45 CFR 95.619.

The title IV-E agency must also continue to meet the APD requirements at 45 CFR 95, Subpart F per 1355.30(k).

Child Welfare Policy Manual

However, if the title IV-E agency does not meet these requirements, the agency may be subject to funding recoupment.

Source: (9/14/16)

Reference: 45 CFR 95, Subpart F; 45 CFR 1355.30(k); 45 CFR 1355.56(d) and (e); 45 CFR 1358; 81 FR 35450 at 35473 (June 2, 2016); 80 FR 48200 at 48220 and 48222 (August 11, 2015)

Child Welfare Policy Manual

7 **Q:** If a S/TACWIS does not transition to CCWIS and meets the notification and continued-use requirements of 1355.56(d), what cost allocation does the S/TACWIS qualify for both during and after the transition period?

A: Through July 31, 2018, the S/TACWIS may continue to claim title IV-E funding according to the cost allocation methodology approved by ACF for the development or the operational cost allocation plan approved by the Department or both.

After July 31, 2018, ACF will classify the system as a non-CCWIS. The non-CCWIS may qualify for non-CCWIS cost allocation.

Source: (9/14/16)

Reference: 45 CFR 1355.56(a); 45 CFR 1355.57(f); 45 CFR 1356.60(d); 81 FR 35450 at 35472 - 35473 and 35475 (June 2, 2016); 80 FR 48200 at 48219 - 48220 and 48222 (August 11, 2016)

8 **Q:** If a title IV-E agency decides to build a new CCWIS, transition a S/TACWIS to CCWIS, or transition a non-S/TACWIS to CCWIS, what CCWIS requirements must the agency meet before claiming funding in accordance with a CCWIS cost allocation?

A: A title IV-E agency must notify ACF of the decision before claiming funding in accordance with a CCWIS cost allocation. The agency must meet the requirements of 1355.52(i)(1) when formally conveying the decision to ACF. Paragraph 1355.52(i)(1) requires that the agency provide the following documents:

- an Advance Planning Document (APD) (if the CCWIS project is over the APD thresholds defined at 45 CFR 95.611) or a Notice of Intent (if the CCWIS project is under APD thresholds);

Child Welfare Policy Manual

a description of how the planned CCWIS will meet the CCWIS project requirements found in 1355.52(a) - (h), and if applicable, any optional exchanges or functions included in the CCWIS as allowed under 1355.54; and

a list of all automated functions planned for the CCWIS including, for each automated function:

<ul style="list-style-type:Disc; margin-left: 2em;">if the automated function supports a requirement of section 1355.52 (CCWIS Project Requirements) or section 1355.54 (CCWIS Options);

if the automated function is not duplicated within the CCWIS or systems supporting child welfare contributing agencies and is consistently used by all child welfare users responsible for the area supported by the automated function; and,

if the automated function complies with paragraph 1355.53(a) (CCWIS Design Requirements), unless exempted from the design requirements by one of the conditions described in paragraph 1355.53(b).

Child Welfare Policy Manual

The title IV-E agency must provide the above documents to ACF by July 31, 2018 (the end of the transition period) if transitioning a S/TACWIS to CCWIS or transitioning a non-S/TACWIS to CCWIS.

Source: (9/15/16)

Reference: 45 CFR 1355.52(i)(1); 45 CFR 1355.56(b); 45 CFR 1355.56(f)(1); 80 FR 48216 - 48217 and 48219 - 48220 (August 11, 2016)

9 Q: Do the CCWIS design requirements listed in 1355.53(a) apply to a S/TACWIS or non-S/TACWIS project transitioning to CCWIS?

A: It depends. For S/TACWIS or non-S/TACWIS projects, the CCWIS design requirements do not apply to automated functions developed on or before July 31, 2018 (the end of the transition period).

The CCWIS design requirements apply to automated functions developed after July 31, 2018 unless ACF approves technical advances in design proposed by the title IV-E agency that ACF determines to be more efficient, economical and effective than the CCWIS design requirements listed in paragraph 1355.53(a).

Source: (9/15/16)

Reference: 45 CFR 1355.53; 45 CFR 1355.57(a); 80 FR 48200 at 48217 - 48218 and 48221; 81 FR 35450 at 35468 - 35471 and 35474 - 35475

Child Welfare Policy Manual

10 Q: Must a S/TACWIS or non-S/TACWIS transitioning to CCWIS meet all CCWIS project requirements described at 1355.52?

A: Yes.

Source: (9/15/16)

Reference: 45 CFR 1355.52

11 Q: Do the CCWIS design requirements listed in 1355.53(a) apply to a new CCWIS?

A: It depends. The CCWIS design requirements apply to all automated functions of a new CCWIS unless ACF approves technical advances in design proposed by the title IV-E agency that ACF determines to be more efficient, economical and effective than the CCWIS design requirements listed in paragraph 1355.53(a).

Source: (9/15/16)

Reference: 45 CFR 1355.53; 45 CFR 1355.57(b); 80 FR 48200 at 48217 - 48218 and 48221; 81 FR 35450 at 35468 - 35471 and 35474 - 35475

12 Q: Must CCWIS projects be operational by the end of the transition period on July 31, 2018?

A: No. CCWIS projects are not required to be operational by the end of the transition period on July 31, 2018.

July 31, 2018 is the deadline by which a title IV-E agency with a S/TACWIS or non-S/TACWIS must notify ACF of the decision to either transition or not transition the system to a CCWIS.

Source: (9/15/16)

Reference: 45 CFR 1355.56(b), (d), and (f)(1); 80 FR 48200 at 48204 and 48219 - 48220; 81 FR 35472 - 35473

Child Welfare Policy Manual

13 Q: If a title IV-E agency transitions a S/TACWIS or non-S/TACWIS to CCWIS, can it replace this CCWIS with a new CCWIS at a later date?

A: Yes. A title IV-E agency may initiate a new CCWIS project at any time.

Source: (9/15/16)

Reference: 45 CFR 1355.56(c) and (f)(2); 80 FR 48200 at 48204 and 48219

14 Q: If a title IV-E agency does not have the resources to begin a new CCWIS project during the transition period, may the agency begin a new CCWIS project after the transition period?

A: Yes. A title IV-E agency may begin a new CCWIS project after the transition period. The CCWIS regulations do not establish deadlines for starting a new CCWIS project.

Source: (9/15/16)

Reference: 45 CFR 1355.56(c) and (f)(2); 80 FR 48200 at 48204 and 48219

15 Q: May a title IV-E agency make changes to the list of automated functions submitted per 1355.52(i)(1)?

A: Yes. The title IV-E agency must submit an updated list of CCWIS automated functions in their Annual Advance Planning Document (APD) or Operational APD, as appropriate, that identifies any revisions to the CCWIS automated functions.

Source: (9/15/16)

Reference: 45 CFR 1355.52(i)(2); 80 FR 48200 at 48217

Child Welfare Policy Manual

16 Q: During the 24 month transition period (August 1, 2016 - July 31, 2018), must a title IV-E agency get ACF approval before implementing enhancements to its S/TACWIS project?

A: It depends. Depending on the scope of the change and the status of the Implementation Advance Planning Document (APD), the agency would either seek approval or report changes in an As Needed, Annual or Operational APD in accordance with 45 CFR 95, Subpart F.

Source: (9/15/16)

Reference: 45 CFR 95, Subpart F

17 Q: Must title IV-E agencies with a S/TACWIS that is not compliant with all S/TACWIS requirements continue to work toward S/TACWIS compliance?

A: No. As of August 1, 2016, the CCWIS regulations are effective and replace S/TACWIS regulations. Therefore, the S/TACWIS regulations are no longer applicable.

Source: (9/15/16)

Reference: 81 CFR 35450 at 35450 and 35473

18 Q: What federal financial participation (FFP) rate are S/TACWIS projects eligible for during the August 1, 2016 - July 31, 2018 transition period?

A: S/TACWIS projects are eligible for 50% FFP for the share of project costs allocable to title IV-E during the August 1, 2016 - July 31, 2018 transition period.

This question and answer is repeated in the Cost Allocation for Transitioning Systems section.

Source: 11/09/16

Child Welfare Policy Manual

Reference: Section 474(a)(3)(C) and (D) of the Social Security Act; 45 CFR 1355.56(a); 80 FR 48200 at 48291 (issued August, 11, 2015); 81 FR 35450 at 35472 (issued June 2, 2016)

19 Q: What cost allocation methodologies are S/TACWIS projects eligible for during the August 1, 2016 - July 31, 2018 transition period for development and operational costs?

A: During the August 1, 2016 - July 31, 2018 transition period, title IV-E agencies with a S/TACWIS project may claim title IV-E funding according to the cost allocation methodology approved by ACF for development or the operational cost allocation plan approved by the Department, or both, per paragraph 1355.56(a).

Activities and costs must be eligible for title IV-E funding and be described in an applicable APD, per 46 CFR 95.610.

This question and answer is repeated in the Cost Allocation for Transitioning Systems section.

Source: 11/09/16

Reference: Section 474(c) of the Social Security Act; 45 CFR 1355.56(a); 45 CFR 95.610; 81 FR 35472 (issued June 2, 2016); 80 FR 48219 (issued August 11, 2015)

Child Welfare Policy Manual

20 Q: May a title IV-E agency use their existing S/TACWIS cost allocation methodology for continued S/TACWIS work after the 24-month transition period?

A: No. The existing S/TACWIS cost allocation methodology is only available for S/TACWIS projects and related project costs during the 24-month transition period from August 1, 2016 - July 31, 2018, per paragraph 1355.56(a).

After the transition period ends on July 31, 2018, S/TACWIS projects that have transitioned to CCWIS may receive CCWIS cost allocation per 1355.57(a). S/TACWIS projects that have been classified as non-CCWIS may receive non-CCWIS cost allocation per 1355.57(f).

This question and answer is repeated in the Cost Allocation for Transitioning Systems section.

Source: 11/09/16

Reference: 45 CFR 1355.56(a); 45 CFR 1357(a), (c), (e), and (f); 81 FR 35472, 35474 - 35475 (issued June 2, 2016); 80 FR 48219, 48221 - 48222 (issued August 11, 2015)

Child Welfare Policy Manual

21 Q: What requirements must a S/TACWIS or non-S/TACWIS system transitioning to CCWIS meet to qualify for CCWIS cost allocation?

A: The transitioning system as a whole must 1) meet the CCWIS project requirements at section 1355.52; and, 2) all automated functions developed after July 31, 2018 must meet the CCWIS design requirements of section 1355.53.

If the system as a whole meets the above two requirements, ACF separately evaluates each automated function. An automated function may qualify for CCWIS cost allocation if it meets three conditions. Those conditions are: 1) the automated function supports programs authorized under titles IV-B or IV-E, and at least one requirement of section 1355.52 or, if applicable section 1355.54; 2) the automated function is not duplicated within the CCWIS or systems supporting child welfare contributing agencies and 3) the automated function is consistently used by all child welfare users responsible for the area supported by the automated function.

This question and answer is repeated in the Cost Allocation for Transitioning Systems section.

Source: 11/09/16

Reference: 45 CFR 1355.52(i)(1); 45 CFR 1355.57(a); 81 FR 35450 at 35467 - 35468 and 35474 - 35475 (issued June 2, 2016) 80 FR 48200 at 48216 - 48217 and 48200 - 48221 (issued August 11, 2015)

Child Welfare Policy Manual

22 Q: We understand that an automated function that is part of a S/TACWIS transitioning to CCWIS may receive S/TACWIS cost allocation for development during the transition period, even if the automated function does not meet the CCWIS design requirements of 1355.53(a), pursuant to paragraph 1355.56(a). However, if the development on this automated function continues after the transition period, may the title IV-E agency claim CCWIS developmental cost allocation for this automated function?

A: No. For transitioning projects, all CCWIS development that occurs after the transition period must meet the CCWIS design requirements described under paragraph 1355.53(a) unless ACF approves, on a case-by-case basis, an alternative design proposed by a title IV-E agency that is determined by ACF to be more efficient, economical, and effective than what is found in paragraph 1355.53(a), pursuant to paragraph 1355.53(b)(2).

Source: 4/24/2017

Reference: 45 CFR 1355.53, 1355.56(a) and 1355.57(a)(1); 81 FR 35450 at 35468 - 35472 and 35473 - 35475 (issued June 2, 2016); 80 FR 48200 at 48217 - 48222 (issued August 11, 2015)

23 Q: For a S/TACWIS transitioning to a CCWIS, may a title IV-E agency claim CCWIS operational funding after July 31, 2018 for the maintenance of automated functions that were developed by July 31, 2018 and do not meet the CCWIS design requirements of paragraph 1355.53(a)?

A: Yes, a title IV-E agency may claim operational funding for these automated functions provided the title IV-E agency has an approved cost allocation plan, pursuant to 45 CFR 95.631(b).

This question and answer is repeated in the cost allocation for transitioning systems section.

Source: 4/24/2017

Reference: 45 CFR 95.631(b), 1355.53(a) and 1355.57(a); 81 FR 35450 at 35468 - 35470 and 35473 - 35475 (issued June 2, 2016); 80 FR 48200 at 48217 - 48217 and 48220 - 48221 (issued August 11, 2015)

Child Welfare Policy Manual

24 Q: If ACF approves a title IV-E agency's plan to transition an existing system to CCWIS prior to July 31 2018, must all development work done after ACF's approval comply with the CCWIS design requirements of 1355.53(a)?

A: Pursuant to long-standing policy, title IV-E agencies were prohibited from suspending adoption assistance payments because a suspension was the equivalent of terminating adoption assistance payments. See ACYF-CB-PIQ-98-02, as incorporated into 8.2 of the Child Welfare Policy Manual (CWPM). Title IV-E agencies advised us that our adoption assistance suspension policy did not allow them the latitude to act when the agency was unsure or doubted that the parent was continuing to provide support to the child/youth. Consequently, we issued a Request for Comment in the Federal Register, 80 FR 17058 (March 31, 2015) asking agencies and other stakeholders to comment on our adoption assistance suspension policy. Informed by the comments we received, we have revised our adoption assistance suspension policy to allow title IV-E agencies to suspend adoption assistance payments in accordance with the guidance provided below.

A title IV-E agency may suspend adoption assistance payments if the agency cannot establish that the adoptive parent is providing any support to the child/youth (including individuals up to age 21 as per an approved title IV-E plan) because the agency has not been able to establish contact with the parent to make such a determination. Any support includes various forms of financial support, as determined by the title IV-E agency. Payments for family therapy, tuition, clothing, maintenance of special equipment in the home, or services for the child's special needs are acceptable forms of financial support. See 473(a)(4)(A)(iii) of the Social Security Act (the Act); CWPM, 8.2D.5, Question and Answer #2.

Similarly, a title IV-E agency may suspend adoption assistance payments if the agency cannot establish that the adoptive parent is legally responsible for the support of the child under age 18 because the agency has not been able to establish contact with the parent to make a determination. A parent is considered no longer legally responsible for the support of a child when parental rights have been terminated or when the child becomes an emancipated minor, marries, or enlists in the military. See 473(a)(4)(A)(ii) of the Act; the Child Welfare Policy Manual at 8.2D.5, Question and Answer #2.

Note that a title IV-E agency cannot reduce or suspend adoption assistance solely because the adoptive parents fail to reply to the agency's request for information, renewal, or recertification of the adoption assistance agreement.

A title IV-E agency only may suspend adoption assistance payments in accordance with the fair hearing requirements at 45 C.F.R. 205.10. Before suspending a payment, the title IV-E

Child Welfare Policy Manual

agency must ensure that notice to the adoptive parents is both timely and adequate, as described at 45 C.F.R. 205.10(a)(4). As such, the title IV-E agency must mail notice of intent to suspend the adoption assistance payments at least ten days before the agency plans to suspend the payments. It also must describe that the agency intends to suspend payments, the reasons for the intended suspension and the title IV-E basis as outlined above for the intended suspension. Finally, the agency must describe the adoptive parent's right to request a fair hearing and the circumstances under which assistance is continued if a hearing is requested.

In order to be able to suspend adoption assistance payments in accordance with the guidance above, the title IV-E agency must first amend its title IV-E plan and have the Children's Bureau approve the change. Note also that each new adoption assistance agreement must include the circumstances under which the title IV-E agency may suspend adoption assistance payments. Similarly, the title IV-E agency may try to re-negotiate existing adoption assistance agreements with the adoptive parent to include the circumstances under which the title IV-E agency may suspend payments; however, the terms of an existing adoption assistance agreement only may be changed with the concurrence of the adoptive parent. If an adoptive parent declines to include such a term in the existing agreement, the title IV-E agency may not suspend adoption assistance payments under that agreement.

If the title IV-E agency suspends adoption assistance as described above, the child/youth remains title IV-E eligible, and the title IV-E adoption assistance agreement remains in effect while the payment is suspended.

Although an agency may suspend a child's adoption assistance payment under the circumstances described above, the child's eligibility for, and receipt of, Medicaid may not be suspended while the adoption assistance agreement is in effect. See 473(b) of the Social Security Act. The title IV-E agency also may claim any title IV-E adoption assistance administrative costs on behalf of a child whose title IV-E adoption assistance is suspended in accordance with its approved cost allocation plan.

Source: 02/12/2018

Reference: 45 CFR 1355.52(i)(1); 45 CFR 1355.53; 45 CFR 1355.57(a); 81 FR 35450 at 35467 - 35471 and 35473 - 35474 (issued June 2, 2016); 80 FR 48200 at 48216 - 48218 and 48220 - 48221 (issued August 11, 2015)

6.16 Cost allocation

1 Q: Is the federal financial participation (FFP) rate for CCWIS mandated by statute?

Child Welfare Policy Manual

A: Yes. Section 474(a)(3)(C) and (D) of the Social Security Act mandates the 50% FFP rate.

Source: 11/09/16

Reference: Section 474(a)(3)(C) and (D) of the Social Security Act.

2 Q: Is FFP available for both CCWIS development and operational costs?

A: Yes. FFP is available for CCWIS development and operational costs.

Source: 11/09/16

Reference: Section 474(a)(3)(C) and (D) of title IV-E of the Social Security Act; 45 CFR 1355.57(e); 81 FR 35450 at 35475 (issued June 2, 2016); 80 FR 48220 at 48222 (issued August 11, 2015)

3 Q: Is CCWIS cost allocation available for the costs for commercial off-the-shelf (COTS) products?

A: It depends.

Federal financial participation is not available to develop COTS products. Software developed using a CCWIS cost allocation must be owned by the state or tribe. The federal government must be granted a royalty-free, nonexclusive, and irrevocable license to reproduce, publish, or otherwise use and authorize others to use for federal government purposes, the software, modifications, and other documents produced.

However, CCWIS cost allocation may be available for COTS licensing fees for the use of COTS products. CCWIS cost allocation may also be available to configure and install COTS products.

Source: 11/09/16

Reference: 45 CFR 1355.57(e)(1); 45 CFR 95.617; 81 FR 35450 at 35475 (issued June 2, 2016); 80 FR 48220 at 48222 (issued August 11, 2015); ACF-OA-PI-31-01 (issued June 11, 2013)

Child Welfare Policy Manual

- 4 **Q:** Are county, external IV-E agency, or private agency systems that collect CCWIS data eligible for CCWIS cost allocation?

A: No. These systems are not eligible for funding under the CCWIS cost allocation methodology.

Source: 11/09/16

Reference: 45 CFR 1355.57(f); 45 CFR 1356.60(d); 81 FR 35450 at 35475 (issued June 2, 2016); 80 FR 48200 at 48222 (issued August 11, 2015)

- 5 **Q:** If automated functions that support the reporting and investigation of child abuse and neglect reside exclusively in a CCWIS, how must the title IV-E agency cost allocate development costs for those automated functions?

A: Pursuant to 1355.57(a) - (e), the title IV-E agency may allocate development costs using a CCWIS cost allocation methodology unless the automated functions in the CCWIS are:

- Duplicated in other systems supporting the state or tribe's title IV-E or title IV-B programs, pursuant to 1355.57(a)(2)(ii) and (b)(2)(ii);
- Not used consistently by all child welfare users responsible for the area supported by the automatic function, pursuant to 1355.57(a)(2)(ii) and (b)(2)(ii);
- Unique child welfare related program functions (such as juvenile justice and adult protective services) not used by the title IV-E program, pursuant to 1355.57(e) and (f) and 45 CFR 95.631; and
- Common or unique functions benefiting other health and human service programs (such as child support, child care, Supplementary Nutritional Assistance Program, Temporary Assistance to Needy Families, Medicaid, courts and/or education programs), pursuant to 1355.57(e) and (f) and 45 CFR 95.631.

This question and answer is repeated in the Child Abuse and Neglect Systems section.

Source: 10/26/2017

Reference: 45 CFR 95.631; 45 CFR 1355.52(e)(2)(i); 45 CFR 1355.57; 81 FR 35450 at 35473 - 35475 (issued June 2, 2016); 80 FR 48200 at 48213 and 48220 - 48222 (issued August 11, 2015)

Child Welfare Policy Manual

6 Q: If automated functions that support the reporting and investigation of child abuse and neglect reside in an external system and are not duplicated in CCWIS, how must the agency cost allocate development costs for those automated functions?

A: Pursuant to 1355.57(e), the title IV-E agency must allocate development costs using a non-CCWIS cost allocation methodology if the automated functions reside in an external system.

This question and answer is repeated in the Child Abuse and Neglect Systems section.

Source: 10/26/2017

Reference: 45 CFR 95.631; 45 CFR 1355.52(e)(2)(i); 45 CFR 1355.57; 81 FR 35450 at 35473 - 35475 (issued June 2, 2016); 80 FR 48200 at 48213 and 48220 - 48222 (issued August 11, 2015)

7 Q: If automated functions that support the reporting and investigation of child abuse and neglect reside in both a CCWIS and an external system, how must the agency cost allocate development costs for those automated functions?

A: Pursuant to 1355.57(e), the title IV-E agency must allocate development costs using a non-CCWIS cost allocation methodology if the automated functions reside in both a CCWIS and an external system. The duplicated development costs are allocated to the benefiting program or programs. All programs pay their share of an automated function under a non-CCWIS cost allocation methodology.

This question and answer is repeated in the Child Abuse and Neglect Systems section.

Source: 10/26/2017

Reference: 45 CFR 95.631; 45 CFR 1355.52(e)(2)(i); 45 CFR 1355.57; 81 FR 35450 at 35473 - 35475 (issued June 2, 2016); 80 FR 48200 at 48213 and 48220 - 48222 (issued August 11, 2015)

Child Welfare Policy Manual

6.16A Cost allocation for transitioning systems

1 Q: What federal financial participation (FFP) rate are S/TACWIS projects eligible for during the August 1, 2016 - July 31, 2018 transition period?

A: S/TACWIS projects are eligible for 50% FFP for the share of project costs allocable to title IV-E during the August 1, 2016 - July 31, 2018 transition period.

This question and answer is repeated in the Transition Period section.

Source: 11/10/16

Reference: Section 474(a)(3)(C) and (D) of the Social Security Act; 45 CFR 1355.56(a); 80 FR 48200 at 48291 (issued August 11, 2015); 81 FR 35450 at 35472 (issued June 2, 2016)

2 Q: What cost allocation methodologies are S/TACWIS projects eligible for during the August 1, 2016 - July 31, 2018 transition period for development and operational costs?

A: During the August 1, 2016 - July 31, 2018 transition period, title IV-E agencies with a S/TACWIS project may claim title IV-E funding according to the cost allocation methodology approved by ACF for development or the operational cost allocation plan approved by the Department, or both, per paragraph 1355.56(a).

Activities and costs must be eligible for title IV-E funding and be described in an applicable APD, per 46 CFR 95.610.

This question and answer is repeated in the Transition Period section.

Source: 11/10/16

Reference: Section 474(c) of the Social Security Act; 45 CFR 1355.56(a); 45 CFR 95.610; 81 FR 35472 (issued June 2, 2016); 80 FR 48219 (issued August 11, 2015)

Child Welfare Policy Manual

3 *Q:* May a title IV-E agency use their existing S/TACWIS cost allocation methodology for continued S/TACWIS work after the 24-month transition period?

A: No. The existing S/TACWIS cost allocation methodology is only available for S/TACWIS projects and related project costs during the 24-month transition period from August 1, 2016 - July 31, 2018, per paragraph 1355.56(a).

After the transition period ends on July 31, 2018, S/TACWIS projects that have transitioned to CCWIS may receive CCWIS cost allocation per 1355.57(a). S/TACWIS projects that have been classified as non-CCWIS may receive non-CCWIS cost allocation per 1355.57(f).

This question and answer is repeated in the Transition Period section.

Source: 11/10/16

Reference: 45 CFR 1355.56(a); 45 CFR 1357(a), (c), (e), and (f); 81 FR 35472, 35474 - 35475 (issued June 2, 2016); 80 FR 48219, 48221 - 48222 (issued August 11, 2015)

Child Welfare Policy Manual

4 Q: What requirements must a S/TACWIS or non-S/TACWIS system transitioning to CCWIS meet to qualify for CCWIS cost allocation?

A: The transitioning system as a whole must 1) meet the CCWIS project requirements at section 1355.52; and, 2) all automated functions developed after July 31, 2018 must meet the CCWIS design requirements of section 1355.53.

If the system as a whole meets the above two requirements, ACF separately evaluates each automated function. An automated function may qualify for CCWIS cost allocation if it meets three conditions. Those conditions are: 1) the automated function supports programs authorized under titles IV-B or IV-E, and at least one requirement of section 1355.52 or, if applicable section 1355.54; 2) the automated function is not duplicated within the CCWIS or systems supporting child welfare contributing agencies and 3) the automated function is consistently used by all child welfare users responsible for the area supported by the automated function.

This question and answer is repeated in the Transition Period section.

Source: 11/10/16

Reference: 45 CFR 1355.52(i)(1); 45 CFR 1355.57(a); 81 FR 35450 at 35467 - 35468 and 35474 - 35475 (issued June 2, 2016) 80 FR 48200 at 48216 - 48217 and 48200 - 48221 (issued August 11, 2015)

Child Welfare Policy Manual

5 Q: For a S/TACWIS transitioning to a CCWIS, may a title IV-E agency claim CCWIS operational funding after July 31, 2018 for the maintenance of automated functions that were developed by July 31, 2018 and do not meet the CCWIS design requirements of paragraph 1355.53(a)?

A: Yes, a title IV-E agency may claim operational funding for these automated functions provided the title IV-E agency has an approved cost allocation plan, pursuant to 45 CFR 95.631(b).

This question and answer is repeated in the transition period section.

Source: 4/24/2017

Reference: 45 CFR 95.631(b), 1355.53(a) and 1355.57(a); 81 FR 35450 at 35468 - 35470 and 35473 - 35475 (issued June 2, 2016); 80 FR 48200 at 48217 - 48217 and 48220 - 48221 (issued August 11, 2015)

6.16B Cost allocation for new CCWIS

1 Q: What requirements must a new system meet to be classified as a new CCWIS and qualify for CCWIS cost allocation?

A: A new system may be classified as a CCWIS if 1) the system as a whole meets, or when completed will meet, the CCWIS project requirements at section 1355.52; and, 2) all of the system's automated functions meet the CCWIS design requirements of section 1355.53.

If the system as a whole meets the above two requirements, ACF separately evaluates each automated function. An automated function may qualify for CCWIS cost allocation if it meets three conditions. Those conditions are: 1) the automated function supports programs authorized under titles IV-B or IV-E, and at least one requirement of section 1355.52 or, if applicable section 1355.54; 2) the automated function is not duplicated within the CCWIS or systems supporting child welfare contributing agencies and 3) the automated function is consistently used by all child welfare users responsible for the area supported by the automated function.

Source: 11/09/16

Child Welfare Policy Manual

Reference: 45 CFR 1355.51; 45 CFR 1355.57(b); 81 FR 35450 at 35474 - 35475 (issued June 2, 2016); 80 FR 48200 at 48205 and 48220 - 48221 (issued August 11, 2015)

6.16C CCWIS cost allocation

- 1 Q:** In order to qualify for CCWIS cost allocation, paragraph 1355.57(e)(1)(iii) requires that activities and automated functions must benefit federal, state or tribal funded participants in programs and allowable activities described in title IV-E of the Act to the title IV-E program. What programs and activities qualify for CCWIS cost allocation under paragraph 1355.57(e)(1)(iii)?
- A:** A title IV-E agency may cost allocate CCWIS activities and automated functions that benefit participants in programs such as foster care, adoption assistance or guardianship programs, pursuant to 1355.57(e)(1)(iii). Activities and automated functions supporting other health and human service programs, such as Temporary Assistance to Needy Families (TANF), Child Care, Child Support, Supplemental Nutrition Assistance Program (SNAP), Medicaid and related state or tribal health and human service programs do not qualify for CCWIS cost allocation pursuant to 1355.57(e)(1)(iii). If a title IV-E agency would like to include some other program not listed here, then the title IV-E agency may present a business case for allocating the cost of activities and automated functions benefiting such program in accordance with 1355.57(e)(1). ACF will review and determine the appropriate cost allocation in accordance with 45 CFR 95 Subpart F.

Source: 11/11/16

Reference: 45 CFR 1355.57(e)(1)(iii); 81 FR 35450 at 35475 (issued June 2, 2016); 80 FR 48220 at 48222 (issued August 11, 2015)

Child Welfare Policy Manual

6.16C.1 Development

No questions and answers are available at this time.

6.16C.2 Operations

1 Q: May title IV-E agencies allocate CCWIS operational costs benefiting title IV-B to title IV-E?

A: No. CCWIS operational costs benefiting title IV-B may not be allocated to title IV-E.

Source: 11/09/16

Reference: 80 FR 48200 at 48220 (issued August 11, 2015); Action Transmittal ACF-OSS-05, Section III (issued February 24, 1995)

6.17 Failure to comply

1 Q: What corrective measures will ACF require a title IV-E agency to implement to end a suspension and reinstate funding per paragraph 1355.58(c)?

(Deleted 09/22/2017)

6.17A Suspension

No questions and answers are available at this time.

6.17B Ending suspension

1 Q: What corrective measures will ACF require a title IV-E agency to implement to end a suspension and reinstate funding per paragraph 1355.58(c)?

A: ACF determines the appropriate corrective measures for a title IV-E agency on a case-by-case basis depending on the reasons for the suspension and other relevant factors. In some cases, ACF may require a title IV-E agency to implement a corrective action plan per paragraph 1355.58(c)(2).

Child Welfare Policy Manual

Source: 4/24/2017

Reference: 45 CFR 1355.58; 81 FR 35450 at 35475-35476 (issued June 2, 2016); 80 FR 48200 at 48222 (issued August 11, 2015)

6.17C Recoupment

No questions and answers are available at this time.